

EXHIBIT 2

<p style="text-align: center;">Page 1</p> <p>IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION CIVIL ACTION NO. 2:15-CV-274-MHH</p> <p>BRIANA WALKER, individually and on behalf of herself and all others similarly situated, Plaintiffs, vs. FREEDOM RAIN, INC., d/b/a THE LOVELADY CENTER, et al., Defendants.</p> <p>DEPOSITION OF MIYOSHI BATES Wiggins Childs Pantazis Fisher & Goldfarb 301 19th Street North Birmingham, Alabama 35203 October 19, 2015</p> <p>REPORTED BY: Laura H. Nichols Certified Realtime Reporter, Registered Professional Reporter and Notary Public</p>	<p style="text-align: center;">Page 3</p> <p>1 A P P E A R A N C E S (Continuing) 2 3 FOR THE DEFENDANTS: 4 Mr. T. Matthew Miller 5 and Ms. Anne Knox Averitt 6 Attorneys at Law 7 Bradley Arant Boult Cummings LLP 8 One Federal Place 9 1819 Fifth Avenue North 10 Birmingham, Alabama 35203 11 205.521.8000 12 tmmiller@babc.com 13 aaveritt@babc.com 14 15 OTHERS PRESENT: 16 Ms. Laketta Mackins 17 Ms. Melinda MeGahee 18 19 20 21 22 23</p>
<p style="text-align: center;">Page 2</p> <p>1 A P P E A R A N C E S 2 3 FOR THE PLAINTIFFS: 4 Messrs. Robert J. Camp 5 and Russell W. Adams 6 Attorneys at Law 7 Wiggins Childs Pantazis 8 Fisher & Goldfarb 9 The Kress Building 10 301 19th Street North 11 Birmingham, Alabama 35203 12 205.314.0500 13 rcamp@wigginschildsls.com 14 radams@wigginschildsls.com 15 16 17 18 19 20 21 22 23</p>	<p style="text-align: center;">Page 4</p> <p>1 INDEX OF EXAMINATION 2 3 Page: 4 EXAMINATION BY MR. MILLER 7 5 EXAMINATION BY MR. CAMP 142 6 REEXAMINATION BY MR. MILLER 153 7 REEXAMINATION BY MR. CAMP 156 8 9 10 INDEX OF PLAINTIFFS' EXHIBITS 11 12 Page: 13 Plaintiffs' Exhibit 1 147 14 15 16 17 18 19 20 21 22 23</p>

INDEX OF DEFENDANTS' EXHIBITS		Page 5	Page 7
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1	Defendants' Exhibit 1	16	I, Laura H. Nichols, a Certified
2	(Responses to Interrogatories)		Realtime Reporter and Registered Professional
3	Defendants' Exhibit 2	62	Reporter of Birmingham, Alabama, and a Notary
4	(Financial Obligation Agreement		Public for the State of Alabama at Large,
5	Between Resident and Lovelady		acting as Commissioner, certify that on this
6	Center/TLC, Residential		date, as provided by the Federal Rules of Civil
7	Rehabilitation)		Procedure of the United States District Court,
8	Defendants' Exhibit 3	74	and the foregoing stipulation of counsel, there
9	(Statement of Understanding and		came before me at the law offices of Wiggins
10	Agreement)		Childs Pantazis Fisher & Goldfarb, 301 19th
11	Defendants' Exhibit 4	98	Street North, Birmingham, Alabama 35203, on
12	(Success Program documentation)		October 19, 2015, commencing at 9:14 a.m.,
13	Defendants' Exhibit 5	100	MIYOSHI BATES, witness in the above cause, for
14	(Resident Rights and		oral examination, whereupon the following
15	Nondiscrimination Policy)		proceedings were had:
16	Defendants' Exhibit 6	121	
17	(Opportunity credit sheet)		17 MIYOSHI BATES,
18	Defendants' Exhibit 7	132	18 being first duly sworn, was examined and
19	(Answers to Interrogatories)		19 testified as follows:
20			
21			20 EXAMINATION BY MR. MILLER:
22			21 Q. Good morning, Ms. Bates.
23			22 A. Good morning.
		Page 6	Page 8
1	S T I P U L A T I O N		
2	IT IS STIPULATED AND AGREED, by		
3	and between the parties, through their		
4	respective counsel, that the deposition of		
5	MIYOSHI BATES may be taken before Laura H.		
6	Nichols, Commissioner, Certified Realtime		
7	Reporter, Registered Professional Reporter and		
8	Notary Public;		
9	That the signature to and reading		
10	of the deposition by the witness is waived, the		
11	deposition to have the same force and effect as		
12	if full compliance had been had with all laws		
13	and rules of Court relating to the taking of		
14	depositions;		
15	That it shall not be necessary for		
16	any objections to be made by counsel to any		
17	questions, except as to form or leading		
18	questions, and that counsel for the parties may		
19	make objections and assign grounds at the time		
20	of trial, or at the time said deposition is		
21	offered in evidence, or prior thereto.		
22			
23			

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1 reporter to take down a nod of the head or an
 2 uh-huh. So a yes or a no or an explanation
 3 will read much better on the record, and she
 4 won't fuss at us if we do that.

5 A. Okay.

6 Q. If I ask you a question and you
 7 give me an uh-huh or an huh-uh, I am probably
 8 going to ask you, is that a yes or is that a
 9 no, okay --

10 A. Okay.

11 Q. -- as we go along? If I ask you a
 12 question and you don't understand it, please
 13 tell me.

14 A. Okay.

15 Q. If I ask you the question and you
 16 answer it and you don't tell me hey, I didn't
 17 understand that question, I am going to assume
 18 you understood it.

19 A. Okay.

20 Q. Is that fair?

21 A. Yes.

22 Q. Okay. If you need to take a
 23 break, you know, just let us know. As long as

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1 you finish answering the question, you can take
 2 a break. That is the only thing I ask, is that
 3 I am right in the middle of a question, that we
 4 not jump up unless there's an issue that your
 5 lawyer needs to address. Then we can take that
 6 up at that time.

7 A. Okay.

8 Q. Are you on any type of medication
 9 that would keep you from being able to have a
 10 full memory today?

11 A. No.

12 Q. Okay. Are you on any type of
 13 medication?

14 A. No.

15 Q. Okay. Are you currently using any
 16 type of prescription drugs?

17 A. No.

18 Q. Are you currently using any type
 19 of illegal drugs?

20 A. No.

21 Q. Okay. When is the last time you
 22 took any type of drugs?

23 MR. CAMP: Objection.

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1 Q. (BY MR. MILLER:) Okay. You can
 2 answer.

3 MR. CAMP: Are we talking about
 4 prescription drugs?

5 MR. MILLER: Talking about any
 6 kind of drugs.

7 MR. CAMP: Well, objection to the
 8 extent that you are asking her whether she has
 9 taken illegal drugs. It is not relevant to the
 10 case, and it is not relevant to the deposition.

11 MR. MILLER: We are going to be
 12 asking that in these depositions. So we can
 13 put it under seal, whatever we need to do, but
 14 it is relevant.

15 MR. CAMP: The client is not going
 16 to testify to an illegal activity.

17 MR. MILLER: So she is going to
 18 take the Fifth?

19 MR. CAMP: Yes.

20 MR. ADAMS: These are limited to a
 21 very specific topic of the employment.

22 MR. MILLER: Exactly. And that
 23 issue applies to the employment issue if you

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1 look at the cases. And if we have to go to the
 2 judge on that, we might as well do it right
 3 away. But it is relevant. If they are going
 4 to take the Fifth, they can take the Fifth.
 5 And whatever assumption applies in a civil case
 6 based on the Fifth, that's up to them.

7 Q. (BY MR. MILLER:) So, ma'am, are
 8 you going to take the Fifth Amendment on your
 9 lawyer's advice and not answer the question?

10 MR. CAMP: Hold on. Go off the
 11 record a minute.

12 MR. MILLER: Okay.

13 (Whereupon, a break was had from
 14 9:17 a.m. until 9:18 a.m.)

15 MR. CAMP: We are not going to
 16 instruct her to take the Fifth. We are going
 17 to instruct her not to answer the question. We
 18 don't think it is relevant to the limited issue
 19 of this deposition. And if we need to get the
 20 Court, let's go ahead and do it.

21 MR. MILLER: Okay. I tell you
 22 what we are going to do. On the record, the
 23 plaintiff has refused to answer the question;

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Page 15

1 is that correct?

2 MR. CAMP: The plaintiff has been
3 instructed by her counsel not to answer the
4 question. It is outside the scope of this
5 deposition.

6 MR. MILLER: We object to that.
7 As these depositions are concluded, we reserve
8 the right to go to the Court to move to reopen
9 the deposition. In fact, we are going to keep
10 all the depositions open on that issue. And we
11 retain the right to move for appropriate relief
12 from the Court, including having the
13 depositions paid for, whatever other sanctions
14 might be appropriate based on the plaintiff not
15 answering the question that has been asked
16 based on a claim that it is outside the scope,
17 when, in a civil deposition, the only
18 appropriate objection is to the form of the
19 question.

20 So unless she is taking the Fifth,
21 we believe it is inappropriate.

22 MR. CAMP: And, obviously, we
23 disagree that the deposition will be left open,

1 it does, we will be happy to let them answer
2 it.

3 MR. MILLER: I don't have to go
4 into my legal theories to let you know. But if
5 y'all are going to instruct them to answer or
6 not today, we are going to be going to the
7 Court on it.

8 MR. ADAMS: Then we may need to go
9 ahead and talk to the Court about that issue.
10 We are not going to let them talk --

11 MR. CAMP: Yeah, we are not going
12 to sit here and take depositions and then have
13 you come back and charge us for the next round
14 when the issue could be solved on the front
15 end. Are you following me? We can go to the
16 Court now, have it taken care of, make sure
17 that we are understanding the Court's order and
18 that it is limited to whether they are
19 employees. And then we can come back and take
20 the depositions.

21 But there's no need for us to get
22 in a fight about this and then you want to come
23 back and try to charge us for sanctions when

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1 and they can move to reopen it if they want to.

2 MR. ADAMS: And we disagree that
3 these depositions have a broad -- the normal
4 broad scope. The Court has said that y'all can
5 take discovery on a very limited issue. We are
6 in an unusual posture in the case because you
7 normally don't get any discovery at this point
8 in time, and the Court has allowed discovery on
9 a very limited issue. And that is all we are
10 going to allow them to answer questions on.

11 MR. MILLER: Just for the record,
12 y'all don't get to decide what we might need to
13 show whether or not these individuals are
14 employees. Okay. Y'all can object to the
15 form. Y'all can move to exclude it, tell the
16 Court it is not relevant. We are trying to
17 keep them short depositions. We are trying to
18 stay focussed on that. But there are some
19 things that we are going to ask them that you
20 may not immediately think oh, that relates
21 directly to whether or not they are employed,
22 but it all does.

23 MR. ADAMS: If you can tell us how

1 you are trying to go outside the scope.

2 MR. MILLER: You just instructed a
3 witness not to answer a question. I will leave
4 that to y'all.

5 MR. CAMP: Fine.

6 MR. MILLER: Fine.

7 Q. (BY MR. MILLER:) Ms. Bates, today
8 we are going to be talking about The Lovelady
9 Center. We may talk about Freedom Rain. Do
10 you know what we are talking about when we talk
11 about those entities?

12 A. I do, yes.

13 Q. Okay. As I said today, if you
14 don't understand one of my questions, let me
15 know.

16 A. I will.

17 Q. I will rephrase it. First, let me
18 show you what I am going to mark as Defendants'
19 Exhibit 1.

20 (Defendants' Exhibit 1 was marked
21 for identification.)

22 Q. (BY MR. MILLER:) I ask you if you
23 have seen this document before. And I will

<p style="text-align: right;">Page 17</p> <p>1 represent to you that it is labeled as Miyoshi 2 Bates's Responses to Interrogatories. 3 A. Yes. 4 THE REPORTER: You are going to 5 need to speak up some. 6 A. Yes. 7 Q. (BY MR. MILLER:) Will you do me a 8 favor and take a look through that? Because I 9 don't think I have a signed copy of it. So 10 what I am going to do is have you under oath 11 tell me that what you have stated in there is 12 accurate and correct. 13 A. Yes. To my knowledge at this 14 time, everything is accurate. 15 Q. Okay. Well, these are your 16 responses. This is my only chance. 17 A. Yes. 18 Q. So as far as you know, everything 19 is accurate? 20 A. Yes. 21 Q. All right. What is your date of 22 birth? 23 A. [REDACTED].</p>	<p style="text-align: right;">Page 19</p> <p>1 A. No. 2 Q. Who did they live with while you 3 were at Lovelady Center? 4 A. Their grandmother. 5 Q. Is that your mom? 6 A. No. My mom is deceased. Their 7 dad's mother. 8 Q. Their dad's mother. Have you ever 9 been in the military? 10 A. No. 11 Q. Are you affiliated with any 12 particular religion? 13 A. Nondenominational. 14 Q. Do you go to a particular church 15 right now? 16 A. No. 17 Q. Have you ever attended a church in 18 the last couple of years? 19 A. Yes. 20 Q. Which church? 21 A. Faith Temple. 22 Q. Faith Temple. Where is that 23 located?</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. And your Social Security number? 2 A. [REDACTED]. 3 Q. And where do you live? 4 A. [REDACTED] 5 [REDACTED] 6 Q. And how long have you lived there? 7 A. On and off, eighteen years. 8 Q. Okay. Are you married? 9 A. Single. 10 Q. Do you have any children? 11 A. Two. 12 Q. Okay. How old are they? 13 A. Eighteen and seven. 14 Q. Your eighteen-year-old, what is 15 the eighteen-year-old's name? 16 A. [REDACTED]. 17 Q. [REDACTED] What is her last name? 18 A. [REDACTED]. 19 Q. [REDACTED] Where does she live? 20 A. Same address. 21 Q. Same address. Okay. Did either 22 of the children live with you at Lovelady 23 Center?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. It is in Powderly on Jefferson 2 Avenue. 3 Q. In where? 4 A. In Powderly, Alabama. 5 Q. Powerly? 6 A. Powderly. 7 Q. Powderly. Okay. All right. Any 8 other churches? 9 A. Not that I can think of. 10 Q. Do you consider yourself to be a 11 person of your word? 12 A. Yes. 13 Q. If you say you will do something, 14 you do it? 15 A. Yes. 16 Q. All right. 17 A. If it was -- if it is in my 18 abilities, yes. 19 Q. Is it ever okay, in your opinion, 20 to lie to help out yourself? 21 A. To help what? 22 Q. To help yourself on something? 23 A. Hold on. Say that again.</p>

<p style="text-align: right;">Page 21</p> <p>1 Q. Is there ever a time when it is 2 okay to lie in order to help yourself? 3 A. No, it is not okay. 4 Q. What about to help your family, is 5 it ever okay to lie to help your family? 6 A. No. 7 Q. Okay. Have you ever had any 8 issues in the past with lying? 9 A. Yes. 10 Q. Okay. When have you had issues 11 with lying? 12 A. What do you mean like issues, like 13 where they have gotten me in trouble or issues 14 where it was a little white lie? 15 Q. Where you lied a lot, like you 16 were lying a lot. 17 A. No. 18 Q. Compulsive lying. 19 A. No. 20 Q. Have you ever had issues when you 21 feel yourself would be untrustworthy? 22 A. Have I ever -- 23 Q. Have you ever had issues with</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. Just one traffic ticket? 2 A. No. It was -- from what I can 3 remember, I think like three, and that was like 4 for speeding. I think I got one for speeding, 5 is all I can think of right now, and then my 6 license got suspended. And I got stopped for 7 driving with a suspended license. And that is 8 what I got put on probation for. 9 Q. Were you on probation when you 10 went to Lovelady? 11 A. No. I had paid all my fines. 12 Q. Do you currently have any arrests 13 that are pending? 14 A. No. 15 Q. Any warrants outstanding? 16 A. No. 17 Q. Any other lawsuits you have ever 18 been involved in other than this one? 19 A. I was in a car accident in 2010, 20 2011. And I sued the gentleman that hit me 21 from behind. But that wasn't here in Alabama. 22 That happened in Georgia. 23 Q. Okay. What happened in that case?</p>
<p style="text-align: right;">Page 22</p> <p>1 being trustworthy? 2 A. I mean how would you say that -- I 3 mean -- 4 Q. How do you define trustworthy? 5 A. With somebody being able to trust 6 me and trust their care with me with something, 7 yeah. 8 Q. Have you ever had a time when you 9 weren't trustworthy? 10 A. Where people -- do you mean where 11 people couldn't trust me or -- 12 Q. Right. Right. 13 A. No. 14 Q. All right. Have you ever been 15 convicted of a crime? 16 A. What is "convicted"? Like if I 17 had to do some time or something? 18 Q. Yes, ma'am. 19 A. No. 20 Q. Or probation. 21 A. Well, I was -- for a traffic 22 ticket. I was on probation for a traffic 23 ticket.</p>	<p style="text-align: right;">Page 24</p> <p>1 A. Well, I got paid. I think it was 2 like ten thousand dollars. 3 Q. Did you have to go to court? 4 A. No. I just went to my doctor. He 5 decided I didn't have to go to court. My 6 attorneys took care of it. I did everything by 7 mail. 8 Q. All right. Have you ever filed a 9 charge with the Equal Employment Opportunity 10 Commission? 11 A. No. 12 Q. Ever talked to anybody with the 13 U.S. Department of Labor? 14 A. No. 15 Q. I don't want to know about 16 specifics with your lawyers, but other than 17 talking to your lawyers, what did you do to get 18 ready for the deposition today? 19 A. Looked for any documentation to 20 prove that what I am saying is correct and 21 truthful. 22 Q. Did you find any? 23 A. Yes, I gave it to my attorneys,</p>

1 what I had.

2 Q. Okay. Is that something you gave
3 to them today?

4 A. No. I have been gave it to them.

5 Q. In the past?

6 A. Uh-huh, yes.

7 Q. Okay. And what was that
8 documentation? What was it you think proves
9 your case?

10 A. Paycheck stubs stating that I was
11 an employee for The Lovelady. The paycheck
12 stub says The Lovelady Center. None of them
13 says Blackwell's Way.

14 Q. Okay.

15 A. Hours worked were more than forty
16 hours per week at a rate of minimum wage. All
17 of -- anytime I did any work for them, it was
18 clear to me that I was going to be compensated
19 for it. I wasn't doing anything just to do it.
20 I was always going to be compensated for it.

21 Q. Okay. Well, what document do you
22 have that shows that?

23 A. The sheets they had me sign

1 A. Lovelady would take, uh-huh.

2 Q. Anything else?

3 A. That is all I can think of right
now.

4 Q. Okay. Now, other than what you
5 just talked about, are there any other
6 documents that you have seen, regardless of
7 where you have seen them, whether you gave them
8 to your lawyers, that you saw them that we
9 produced, that you have seen when you were at
10 Lovelady, any other documents that you think
11 support your position that you were an
12 employee?

13 A. No, not at this time.

14 Q. All right. So the answer is that
15 we have got some paycheck stubs; is that right?

16 A. Yes.

17 Q. You have got opportunity credit
18 sheets?

19 A. Well, I don't have those.

20 Q. But I am just asking you what you
21 think supports --

22 A. Yes.

1 like that you put your hours on, like the time
2 sheets.

3 Q. What did it say on the time
4 sheets?

5 A. Some of them say "opportunity
6 credits." Some of them say --

7 THE REPORTER: Some of them say --

8 A. Opportunity.

9 (Off-the-record discussion.)

10 MR. CAMP: He is asking what you
11 provided us.

12 MR. ADAMS: Only what you gave to
13 us. Not what you looked at that they sent over
14 this morning.

15 A. Okay. Receipts showing where the
16 hours that I worked at Blackwell's Way and the
17 money that they would take for my rent. And
18 what was left, they would give you these sheets
19 to show you your amount, and then they would
20 give me my receipts showing that I paid my rent
21 and other fees that ensued while I was there.

22 Q. (BY MR. MILLER:) When you say
23 "they" would take, would Lovelady --

1 Q. Some sheets showing the amounts
2 you were paid?

3 A. Yes.

4 Q. Like receipt forms?

5 A. Yes, receipts.

6 Q. And a sheet showing the hours you
7 worked?

8 A. Yes.

9 Q. Is there anything else?

10 A. That is all I can think of at this
11 time.

12 Q. Tell me about where you went to
13 school, what your education is.

14 A. Starting from where?

15 Q. Starting from high school.

16 A. Okay. I attended Wenonah High
17 School from '93 to '97. And then in '99 -- I
18 didn't get my high school diploma because -- I
19 don't know -- okay. I had a baby, and she was
20 sick. She had to have open heart surgery. And
21 then my mama passed. And then -- okay. Then,
22 so I ended up getting my GED from Virginia
23 College in '99. I attended Bessemer State Tech

<p style="text-align: center;">Page 29</p> <p>1 in 2001 and got my CNA license to work at a 2 nursing home. That is -- those are -- that is 3 my educational background.</p> <p>4 Q. All right. Any type of legal 5 training?</p> <p>6 A. No.</p> <p>7 Q. Do you know what the Fair Labor 8 Standards Act is?</p> <p>9 A. I have heard of it.</p> <p>10 Q. What is it?</p> <p>11 A. Isn't it an act for fair labor, 12 fair work?</p> <p>13 Q. And what does it say?</p> <p>14 A. I don't know. I have just heard 15 about just that title. I have never heard it 16 per se.</p> <p>17 Q. Do you know what the law is on 18 overtime, what does the law say about overtime?</p> <p>19 A. Yes, that if any employee works 20 overtime, they should be paid overtime, 21 overtime hours.</p> <p>22 Q. How --</p> <p>23 A. Time and a half.</p>	<p style="text-align: center;">Page 31</p> <p>1 not file any tax returns in 2012, 2013 or 2014? 2 A. Yes. That is correct.</p> <p>3 Q. And you don't know the amount of 4 your income for any of those years?</p> <p>5 A. I don't.</p> <p>6 Q. Well, how come you didn't file? 7 Why did you not file taxes?</p> <p>8 A. Because I was not given anything 9 to file them while I was at The Lovelady 10 Center.</p> <p>11 Q. Were you given a 1099?</p> <p>12 A. Not while I was there, no. That 13 was given to me after I have been dismissed.</p> <p>14 Q. Okay. But you got that in 2014?</p> <p>15 A. '15. And I had to call and ask 16 for it.</p> <p>17 Q. Oh, you called and asked for a 18 1099?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Okay. Who did you call and ask 21 for it?</p> <p>22 A. Rosie Mullens.</p> <p>23 Q. What made you call and ask for it?</p>
<p style="text-align: center;">Page 30</p> <p>1 Q. Okay. How many hours is overtime?</p> <p>2 A. Any hour over forty hours a week.</p> <p>3 Q. Okay. All right. What else do 4 you know about the wage and hour laws?</p> <p>5 A. I know minimum wage is seven 6 dollars and twenty-five cents an hour.</p> <p>7 Q. How much of that did you know when 8 you were at Lovelady?</p> <p>9 A. I can't recall at this time.</p> <p>10 Q. So you don't know whether you knew 11 any of that when you were at Lovelady?</p> <p>12 A. No.</p> <p>13 Q. But you know it now?</p> <p>14 A. Yeah, because of this case.</p> <p>15 Q. Any type of medical training other 16 than your CNA, your nursing?</p> <p>17 A. Yes. I worked at UAB hospital as 18 a patient care technician. And I worked at 19 Caremark as a pharmacy technician.</p> <p>20 Q. Okay. Anything else?</p> <p>21 A. No.</p> <p>22 Q. Did I read your discovery 23 interrogatory responses correctly that you did</p>	<p style="text-align: center;">Page 32</p> <p>1 A. Because I know that I was supposed 2 to get something from working in the past, you 3 know. You are supposed to get something, you 4 know, from working to show that that is filed 5 with the IRS. So I just called to see if they 6 had one.</p> <p>7 Q. Okay. Did you work in 2013? Were 8 you at Lovelady in 2013?</p> <p>9 A. I was.</p> <p>10 Q. Did you get --</p> <p>11 A. That's when I first -- I worked at 12 The Lovelady Center, yeah.</p> <p>13 Q. Did you get a 1099 for 2013?</p> <p>14 A. No.</p> <p>15 Q. Did you ask for one?</p> <p>16 A. No.</p> <p>17 Q. Tell me about where you've worked 18 since high school.</p> <p>19 A. Which job? I've had a bunch of 20 jobs. I worked temporary agencies. I worked 21 at Regions Bank. I worked at Stanberry & 22 Associates. That is a tax preparation service. 23 I have worked for sitting agencies, home health</p>

1 agencies. Awesome Sitters service. Then I
 2 worked at UAB as a patient care technician.
 3 Then the job at Caremark pharmacy and at The
 4 Lovelady Center.

5 Q. Are you working now?

6 A. No.

7 Q. What was the last job you had?

8 A. The Lovelady Center.

9 Q. So the last time, according to
 10 you, that you worked was at The Lovelady
 11 Center. That would have been in what, February
 12 of 2014?

13 A. Yes.

14 Q. Have you applied for any jobs
 15 since leaving The Lovelady Center?

16 A. No.

17 Q. You haven't applied for any jobs
 18 at all?

19 A. No.

20 Q. Online or sending out a resume,
 21 none of that?

22 A. No.

23 Q. Why not?

1 and clothing and all that stuff?

2 A. That's correct.

3 MR. CAMP: Objection.

4 Q. (BY MR. MILLER:) So the last time
 5 you worked or applied for any work was February
 6 2014?

7 A. The last time I worked.

8 Q. The last time you worked. And you
 9 haven't applied anywhere since?

10 A. No.

11 Q. Is that correct?

12 A. That's correct.

13 Q. When you worked at the temporary
 14 service, tell me about that. How did that come
 15 about? Did you see an ad in the paper? Did a
 16 friend tell you about it?

17 A. I think I applied online.

18 Q. Okay. So it was --

19 A. That was so long ago. That was
 20 back in 2000. I could have walked in the
 21 temporary agency and just filled out a paper
 22 application. I can't remember, it is so far
 23 back. One of the two, I either applied online

1 A. When I left The Lovelady Center, I
 2 just was -- no reason.

3 THE REPORTER: I'm sorry. I can't
 4 understand you.

5 A. It is no reason in particular. I
 6 just haven't.

7 Q. Why do you --

8 A. Because when I was at The Lovelady
 9 Center, you know, I was working to pay my fees
 10 there. So when I got dismissed from The
 11 Lovelady Center, I didn't have the fees anymore
 12 so --

13 Q. What you were doing at The
 14 Lovelady Center, if I understand, you were
 15 working and you were using that money to pay
 16 your fees that you owed to Lovelady Center; is
 17 that right?

18 A. Yes.

19 Q. What are you doing now for income?

20 A. I don't have any income.

21 Q. Are you living with family?

22 A. Yes, I live with family.

23 Q. And they are providing you food

1 or did a walk-in.

2 Q. Okay. Either way, you filled out
 3 an application?

4 A. Yes.

5 Q. An application for a job?

6 A. Yes.

7 Q. And then after you filled out the
 8 application, did you interview with somebody?

9 A. Yes.

10 Q. Okay. And what kind of things
 11 happened in that interview? What kind of
 12 things did they ask you?

13 A. My work experience, my work ethic.
 14 They discussed rate of pay, hours worked, what
 15 shift I would work, insurance.

16 Q. Okay. At that point, did they
 17 tell you we have decided we want to hire you or
 18 at some point after --

19 A. No.

20 Q. -- the interview did they say,
 21 "Ms. Bates, we want to hire you for a job"?

22 A. Yeah, they initially called and
 23 offered me a position.

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1 Q. Okay. And what position did they
2 offer you?

3 A. Whatever the position was that I
4 applied for. If it was receptionist, it was a
5 receptionist.

6 Q. So you applied for a specific
7 position?

8 A. Yes.

9 Q. And they interviewed you about
10 that position?

11 A. Yes.

12 Q. And you filled out an application?

13 A. Yes.

14 Q. And they called you and told you
15 you had been hired for that position?

16 A. Yes.

17 Q. And what your rate of pay would
18 be?

19 A. That's correct.

20 Q. And what your benefits would be?

21 A. That's correct.

22 Q. And you decided yes, I accept the
23 job?

1 A. I was a -- what do you call those
2 people? I encoded the checks.

3 Q. You entered data?

4 A. Yes. I ran the checks through the
5 machines. I forgot what it is called. But I
6 encoded the checks, like the debits and the
7 credits and ACH. I have forgotten what they
call that.

8 Q. Okay. When you worked at Regions,
9 did you fill out an application?

10 A. I did.

11 Q. Did you do it online or in person?

12 A. Online.

13 Q. You specifically went online to
14 try to get a job with Regions?

15 A. I did.

16 Q. And pulled down the application?

17 A. Yes.

18 Q. And it said job application on it?

19 A. Yes.

20 Q. And you filled it out?

21 A. That's correct.

22 Q. And then hit send or whatever you

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1 A. That's correct.

2 Q. And who did you report to? Did
3 you have a supervisor that you reported to?

4 A. Yes.

5 Q. And what did the supervisor do?

6 A. Or a team leader. Mostly the
7 supervisors just introduced their selves. Most
8 jobs I have had, I have had a team leader that
9 will tell you the position and what to do.

10 Q. And what jobs have you had where
11 you have had a team leader?

12 A. The Lovelady. You have somebody
13 watching you the whole time.

14 Q. When you were inside The Lovelady
15 Center?

16 A. Yes.

17 Q. Any other jobs where you have had
18 a team leader?

19 A. Yes, at the bank.

20 Q. Is that Regions?

21 A. Regions Bank.

22 Q. Okay. And what did you do for
23 Regions Bank?

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1 do on a computer to send it in?

2 A. Yes.

3 Q. And then did somebody contact you
4 from Regions?

5 A. Yes.

6 Q. And what did they say, hey, we
7 want to have an interview with you?

8 A. Well, actually I did a phone
9 interview first. And if you pass the phone
10 interview, they invited you in for an interview
11 in person.

12 Q. So there were a couple of
13 different levels of interviews?

14 A. Yes.

15 Q. What kind of questions did they
16 ask you on the phone?

17 A. My job relevancy to the position
18 that I applied for and my availability to be
19 able to work.

20 Q. Your experience?

21 A. Yes.

22 Q. And did you talk about the rate of
23 pay?

<p style="text-align: center;">Page 41</p> <p>1 A. Yes. 2 Q. And did you talk about your job 3 history? 4 A. That's correct. 5 Q. Okay. And did somebody call you 6 in or call you on the phone and say, 7 "Ms. Bates, we want to hire you for this job"? 8 A. Yes. 9 Q. And was it a specific job that you 10 applied for? 11 A. I can't remember, but I think so. 12 I probably applied for several positions, and 13 the one that they called me back for, I 14 accepted it. 15 Q. When they called you, they told 16 you they were hiring you for a specific 17 position? 18 A. Yes. 19 Q. And you accepted? 20 A. Yes. 21 Q. And they talked to you about pay 22 and benefits and those types of things? 23 A. Yes.</p>	<p style="text-align: center;">Page 43</p> <p>1 instructions, here is what you need to do 2 today? 3 A. Yes. 4 Q. Let you know what your schedule 5 was going to be? 6 A. Yes. 7 Q. Let you know if you had an issue 8 at work? 9 A. Yes. 10 Q. And did you go to them if you had 11 a specific question during the day about 12 something? 13 A. Yes. 14 Q. Has that been the case at 15 Caremark? You said you worked at Caremark? 16 A. Yes. 17 Q. When you worked at Caremark, did 18 you fill out an application? 19 A. I did online. 20 Q. And did somebody interview you? 21 A. Yes. 22 Q. And what job were you interviewing 23 for?</p>
<p style="text-align: center;">Page 42</p> <p>1 Q. Is that right? 2 A. Yes. 3 Q. What did you do, you coded the 4 checks? 5 A. Yes. 6 Q. And did you have somebody you 7 reported to? 8 A. Yes, my team leader. 9 Q. Okay. Who was that? 10 A. I don't remember her name. I 11 don't remember her name. 12 Q. Was she there with you every day? 13 A. Yes. 14 Q. Most every day? 15 A. Yes. 16 Q. In the same location where you 17 were? 18 A. Yes. If she wasn't in the 19 department, yes, she was able to be reached. 20 Q. But she was with you in the same 21 building? 22 A. Yes. 23 Q. And did she give you job</p>	<p style="text-align: center;">Page 44</p> <p>1 A. Pharmacy technician. 2 Q. And did they ask you questions 3 related to being a pharmacy technician? 4 A. You actually had to pass the test. 5 Q. Okay. 6 A. And once I scored what they felt 7 was acceptable, they called you in for an 8 interview. 9 Q. Then you had to apply for a 10 license, send the money in for a license? 11 A. I did that after I gained like 12 ninety days of training and I was tested again. 13 And then I do have my license, yes. 14 Q. And as a pharmacy tech, you always 15 had to have a pharmacist there with you 16 on-site, correct? 17 A. Yes. The pharmacist actually 18 stood over you all the time. 19 Q. That was your supervisor? 20 A. No. 21 Q. Who was your supervisor? 22 A. I don't remember her name. 23 Q. Somebody other than a pharmacist?</p>

1 A. Yes.
 2 Q. Was that supervisor there also?
 3 A. Yes.
 4 Q. During the day, on-site?
 5 A. In the building.
 6 Q. Were you ever terminated from any
 7 of those jobs?
 8 A. Yes.
 9 Q. Which ones were you terminated
 10 from?
 11 A. Caremark for not being on time.
 12 Q. Were you ever disciplined in any
 13 of your jobs, get written discipline?
 14 A. No.
 15 Q. And the only time you have ever
 16 been terminated was at Caremark?
 17 A. At Caremark.
 18 Q. Did any of the jobs that you have
 19 ever held that we just talked about, at
 20 Regions, Caremark, the job placement, the --
 21 what was the name of that place, the temporary
 22 agency, right?
 23 A. (Nodding.)

1 Q. Did you pay for it, when they fed
 2 you?
 3 A. No.
 4 Q. Did you go through counseling in
 5 any of those jobs, like psychological
 6 counseling or spiritual counseling?
 7 A. No.
 8 Q. Did they make you go through any
 9 of that on any of those jobs?
 10 A. No.
 11 Q. Were any of those jobs providing
 12 you any type of treatment or rehab for
 13 dependency?
 14 A. No.
 15 Q. Tell me, what is The Lovelady
 16 Center?
 17 A. It is a treatment center for women
 18 who are addicted to substances.
 19 Q. What is its purpose?
 20 A. I guess its purpose is to help the
 21 women that are addicted to substances to better
 22 themselves.
 23 Q. When did you first hear about it?

1 Q. At any of those, did you have to
 2 pay any of them fees?
 3 A. Yes.
 4 Q. Okay. Who did you pay fees to?
 5 A. At UAB, well, actually, they were
 6 taken out my check.
 7 Q. For what?
 8 A. Parking, some courses that we had
 9 to take like what they called continuing
 10 educating units.
 11 Q. Uh-huh.
 12 A. That is it.
 13 Q. Parking and continuing education
 14 and maybe for benefits?
 15 A. Yes.
 16 Q. Any of them, did you have to pay
 17 to live there? Did you live on-site with any
 18 of those employers?
 19 A. No.
 20 Q. Did any of those employers provide
 21 you with all your meals?
 22 A. Not all my meals. But they did
 23 feed us sometime at some of my jobs.

1 A. I Googled -- what did I Google? I
 2 think I Googled treatment centers in
 3 Birmingham, Alabama, and they were one of the
 4 three that I looked up and decided to go check
 5 out.
 6 Q. Do you remember what the other
 7 ones were?
 8 A. Aletheia House and Olivia's House,
 9 I think. Olivia's House.
 10 Q. Why were you looking for a
 11 treatment center?
 12 A. I had lost my way a little, just
 13 needed to get back on track with some things.
 14 Q. Were you employed at the time?
 15 A. No.
 16 Q. Okay. Had you recently lost a
 17 job?
 18 A. No.
 19 Q. Were you looking for employment at
 20 the time you applied at Lovelady?
 21 A. I can't -- I don't remember.
 22 Q. Okay. What was your condition at
 23 the time?

<p style="text-align: center;">Page 49</p> <p>1 A. What do you mean my condition? 2 Q. Were you suffering from drug 3 dependency? 4 A. Yes. That is why I went. 5 Q. Okay. Were there other things 6 going on in your life as a result of that drug 7 dependency that caused you to feel like you 8 needed to reach out for help? 9 A. Yes. My kids weren't staying with 10 me at the time. 11 Q. Had DHR taken your children? 12 A. Yes. Well, they were with their 13 father. 14 Q. Were you allowed to have your 15 children at that time legally or had they been 16 taken from you? 17 A. No, they had been taken from me. 18 Q. And did you think that going 19 through The Lovelady Center, if you made it 20 through their rehabilitation, that might enable 21 you to be able to get your children back? 22 A. That wasn't, no, the reason I 23 went -- I went for myself.</p>	<p style="text-align: center;">Page 51</p> <p>1 A. I was still functional. 2 Q. Functional? Okay. Had you ever 3 lost any jobs in the past due to dependency 4 issues or related to that? 5 A. No. 6 Q. No. From looking at the 7 documents, it looks like you enrolled in 8 January of 2012? 9 A. That's correct. 10 Q. Can you tell me about that? You 11 looked online and came across Lovelady Center 12 and a couple of other options for treatment? 13 A. Yes. 14 Q. And what was it about The Lovelady 15 Center that made you decide to pursue that, 16 that one instead of the others? 17 A. All the other ones, I felt like 18 they just weren't quick to call me back. One 19 wanted to put me on a waiting list. I guess 20 because a lot of times when I went, I didn't 21 have anything in my system. Because I wasn't 22 just out there, you know, and -- because when I 23 went to Lovelady, I was self. I wasn't</p>
<p style="text-align: center;">Page 50</p> <p>1 Q. Tell me about that. 2 A. What do you mean? 3 Q. You went for yourself. What were 4 you trying to achieve? 5 A. It was for depending on 6 medication. 7 Q. Okay. To get off the substances 8 that you were on? 9 A. That's right. 10 Q. To get clean? 11 A. That's correct. 12 Q. Any other reason that you went? 13 A. No. 14 Q. Did you feel like you were 15 physically and emotionally capable of holding 16 down a job at the time that you were at 17 Lovelady? 18 A. Yes. 19 Q. You could hold down a job? 20 A. Yes. 21 Q. Even though you were suffering 22 from dependency issues, you could still go to 23 work?</p>	<p style="text-align: center;">Page 52</p> <p>1 court-ordered. Nobody made me to go. I went 2 on my own cognizance, you know. 3 Q. And when you went in, did you test 4 positive at that time when you went into 5 Lovelady? 6 A. I did. 7 Q. Do you have to test positive to 8 enroll? 9 A. I am not sure. 10 Q. Tell me about that. You called or 11 did you fill out something online or did you 12 just look them up online? 13 A. I just looked them up online. And 14 I called and called. And nobody called me 15 back, actually. So I just went over there. 16 And when I went over there, The Lovelady turned 17 me around too. 18 Q. Who did you talk to at Lovelady? 19 A. I can't think of her name. I 20 can't think of her name right now. 21 Q. Is there somebody that you 22 initially -- 23 A. She was in the intake department.</p>

<p style="text-align: center;">Page 53</p> <p>1 Q. Okay. 2 A. Somebody in intake. 3 Q. You met somebody at intake? 4 A. Uh-huh. 5 Q. And you talked to them? 6 A. Yes. 7 Q. Did you fill out an intake form? 8 A. Not at that time. 9 Q. Okay. Why not? 10 A. They said that they didn't have any beds. 11 Q. Okay. So they had to have -- 12 A. And that I didn't have the intake fee either. She told me to come back with the intake fee or either half of the intake fee and they will see about getting me in the program then. 13 Q. How much was the intake fee? 14 A. Five hundred dollars. 15 Q. So you looked online, found some places, ended up going down to The Lovelady Center; is that correct? 16 A. Yes.</p>	<p style="text-align: center;">Page 55</p> <p>1 later or did you go back later? 2 A. No. I went back the next day. 3 Q. The next day? 4 A. Yes. 5 Q. Okay. 6 A. And this time I had my aunt with me, and my aunt did most of the talking. And they went ahead and accepted me in the program. 7 Q. Okay. So your aunt went to -- I say aunt. You say aunt. 8 A. Yeah. 9 Q. -- went down to Lovelady with you. Did y'all go back to intake again? 10 A. Yes. 11 Q. Do you remember who y'all talked to? 12 A. I said I cannot think of her name. 13 But she was the one -- the main one that ran intake. 14 Q. Okay. All right. And they accepted you into the program? 15 A. Yes. 16 Q. Okay. When you went in, did you</p>
<p style="text-align: center;">Page 54</p> <p>1 Q. Walked in. 2 A. Yes. 3 Q. Went and talked to somebody in the intake department. 4 A. Yes. 5 Q. And at that time you were turned away because they didn't have enough beds -- 6 A. Yes. 7 Q. -- and because you didn't have the intake fee. 8 A. Yes. I forgot what they called the beds -- they have beds available, I guess, if you were to come in and don't have any money. I forgot what she referred to them as. But they didn't have any at that time. But had I had the five hundred dollar intake fee, I could have been enrolled in the program that day. 9 Q. They didn't have any beds available for people who didn't have the ability to pay for it? 10 A. That's correct. 11 Q. And did somebody call you back</p>	<p style="text-align: center;">Page 56</p> <p>1 have to fill out a job application? 2 A. Not that I can remember. 3 Q. Did you interview for a job at Lovelady when you first went there? 4 A. No, not that I can remember. 5 Q. You didn't go there looking to be hired for a job; you went there for treatment, correct? 6 A. Yes and no. I went there for treatment, but in order to get the treatment, I had to work. 7 Q. To pay for the beds -- 8 A. Yes. 9 Q. -- and to pay for the treatment? 10 A. Yes. Because I didn't have any money to -- and I didn't have anybody to give me any money. So it was brought to my attention in order to be in this program, you had to have some kind of income or some kind of money to pay your way through the program. 11 Q. Okay. All right. Does Lovelady have people who work there full-time who are not enrolled in the program?</p>

1 A. Yes.
 2 Q. Okay. Like do you know Melinda?
 3 A. Yes.
 4 Q. She is sitting here today. Is she
 5 enrolled in the program?
 6 A. No.
 7 Q. Was she when you went in?
 8 A. No.
 9 Q. Does she work with Lovelady?
 10 A. Yes.
 11 Q. Okay. So they have a group of
 12 people who work at Lovelady helping with their
 13 treatment program, their rehabilitation
 14 program --
 15 A. Yes.
 16 Q. -- who are not enrolled in the
 17 program?
 18 A. That's correct.
 19 Q. Okay. Have you ever been out to
 20 Lovelady to apply for a job where you would not
 21 be enrolled in the program, in the treatment
 22 program?
 23 A. While I was at The Lovelady?

1 website that you go on like a jobs department
 2 website. And it would just be out there for
 3 anybody, almost like a monster.com.
 4 Q. Uh-huh.
 5 A. You had to do that.
 6 Q. You weren't submitting that to
 7 Lovelady for a job; you were creating one to
 8 submit out to the general public, the
 9 workforce?
 10 A. Yes. But it was required of The
 11 Lovelady. You had to get a signature stating
 12 that you did that.
 13 Q. Okay. Lovelady required you to
 14 complete a resume to put out on this website
 15 with other employers?
 16 A. Yes.
 17 Q. Is that correct?
 18 A. Yes.
 19 Q. And did you do that?
 20 A. I did.
 21 Q. When you first went into Lovelady
 22 and you enrolled, did you have to pay any fees?
 23 Did you have to pay your intake fee?

1 Q. Has there ever been a point when
 2 you have been at Lovelady when you haven't been
 3 enrolled in the program, in the treatment
 4 program?
 5 A. No.
 6 Q. Anytime you have been at Lovelady,
 7 you were enrolled?
 8 A. Yes.
 9 Q. And you were having to pay fees?
 10 A. Yes.
 11 Q. Did you ever submit a resume to
 12 Lovelady?
 13 A. Yes.
 14 Q. You did?
 15 A. You had to. That was actually one
 16 of the ways to gain a signature to be moved up.
 17 You had -- and you had to go online and you had
 18 to set up an account with the Alabama
 19 Department website. You had to submit your
 20 resume and -- so, yes.
 21 Q. Okay. Who were you submitting
 22 that resume to?
 23 A. Nobody in particular. It is a

1 A. No. I didn't have any money.
 2 Q. They enrolled you in the program
 3 without you paying the intake fee?
 4 A. Yes.
 5 Q. What was your understanding about
 6 how you were going to pay for the intake fee?
 7 A. That I was going to have to work
 8 in order to get the fees paid down.
 9 Q. Did you talk when you were at
 10 Lovelady about a specific job that you were
 11 going to perform when you first enrolled?
 12 A. No. I was told which jobs that I
 13 could do.
 14 Q. Okay. When you first enrolled?
 15 A. Yes.
 16 Q. Wasn't it the first thirty days
 17 that you didn't do any work?
 18 A. I didn't.
 19 Q. Is that correct?
 20 A. That's correct.
 21 Q. What did you do the first thirty
 22 days?
 23 A. Worked the program, just attended

<p>1 some classes. 2 Q. Did you go through some 3 rehabilitation? 4 A. I attended some classes. 5 Q. What kind of classes? 6 A. A lot of my classes are like 7 spiritual classes. 8 Q. Was that something you did 9 throughout the time you were at Lovelady? 10 A. Yes. 11 Q. Was that a requirement? 12 A. Yes. 13 MR. CAMP: I need a bathroom break 14 whenever you get a chance. 15 MR. MILLER: Okay. This is a good 16 time. 17 (Whereupon, a break was had from 18 10:05 a.m. until 10:13 a.m.) 19 Q. (BY MR. MILLER:) Ms. Bates, we 20 are back on the record. 21 A. Okay. 22 Q. Let me show you what I am going to 23 mark as Defendants' Exhibit 2.</p>	<p>Page 61</p> <p>1 folks there at intake, this would have been one 2 of the documents you would have filled out? 3 A. Yes. 4 Q. And it says Ms. Lott, L. Lott. Is 5 that who you would have met with at intake? 6 A. Yes. 7 Q. Cindy Ledkins, was she also there, 8 client representative? 9 A. I don't remember her being there. 10 Q. Okay. Did you have somebody 11 called a client representative? 12 A. Not when I was filling out these 13 papers. 14 Q. Okay. Did you later? 15 A. Yes. 16 Q. Okay. And what did the client 17 representative do? 18 A. What do you mean do? Like what? 19 Q. What was their job? That was 20 somebody who worked at Lovelady, the client 21 representative? 22 A. Yes. 23 Q. Who was not enrolled in the</p>
<p>1 (Defendants' Exhibit 2 was marked 2 for identification.) 3 Q. (BY MR. MILLER:) And I ask you if 4 that is your signature on that document. 5 A. Yes. 6 Q. And what is that document called? 7 A. Financial Obligation Agreement 8 Between Resident and Lovelady Center/TLC, 9 Residential Rehabilitation. 10 Q. Okay. It is a financial 11 obligation? 12 A. Yes. 13 Q. All right. It has a date on 14 there. It says January 23rd, 2012. I want to 15 make sure that I am correct. Did you start 16 there in January of 2012 or January of 2013? 17 A. It was 2012. 18 Q. It was 2012? 19 A. Yes. 20 Q. Okay. And you were there until -- 21 A. February of 2014. 22 Q. Okay. All right. So you went in 23 in January 2012. And when you met with the</p>	<p>Page 62</p> <p>1 program? 2 A. Well, she had been through the 3 program, but she was not enrolled in the 4 program. 5 Q. Had graduated from it? 6 A. Yes. 7 Q. Okay. And was now working for 8 Lovelady; is that correct? 9 A. Yes. 10 Q. What was their role? What was 11 their job? What did they do, client reps? 12 A. They -- from my recollection, they 13 would do like a tour of The Lovelady Center, 14 showed you your room and gave you a set of 15 guidelines of what were expected of you and 16 what we expected of them. 17 Q. Was that somebody you could go to 18 if you had questions while you were enrolled? 19 A. Yes. 20 Q. The client representative was like 21 your person that you could go to with issues or 22 questions? 23 A. One of the persons, yes.</p>

<p style="text-align: center;">Page 65</p> <p>1 Q. Was there somebody else you could 2 also go to? 3 A. Yes. 4 Q. Who was that? 5 A. It was the counselors, the head of 6 Lovelady, like Ms. Melinda. 7 Q. Ms. Melinda who is sitting here? 8 A. Yes. 9 Q. Did you ever go talk to Melinda? 10 A. Yes. 11 Q. Did you know her while you were at 12 Lovelady? 13 A. Only when I needed to go talk to her. 14 Q. Okay. How often did you go talk to her? 15 A. I think I met with her maybe from my recollection, maybe three times. 16 Q. Was she nice to you? 17 A. Yes. 18 Q. Was she helpful? 19 A. Yes. 20 Q. Did you feel like she was trying</p>	<p>1 A. The client reps or somebody in job placement. 2 Q. What did you say? 3 A. Well, all the hours worked, I mean, my rent was -- sometimes, you know, it would be caught up, but I always incurred some kind of fee on there that I felt like I was working, it should have been taken care of. Because I was rarely in the Center. I was always somewhere working. I was rarely in my room is what I am saying. 12 I was always somewhere working, whether it be chores, cleaning up the building, working at The Lovelady Center, and there was times that I couldn't buy myself something to eat, you know. 17 Q. That is what you said to them? 18 A. Uh-huh. 19 Q. Anything else? 20 A. That is all I can remember at this time. 22 Q. Okay. So you felt like you should have been getting more money in?</p>
<p style="text-align: center;">Page 66</p> <p>1 to help you? 2 A. I can't -- I can't recall. 3 Q. Was she a nice person? 4 A. Yes. 5 Q. Was there anything about her that 6 you didn't like, that you had problems with? 7 A. No. 8 Q. Did you feel like she was in any 9 way unfair to you? 10 A. I can't recall at this time. 11 Q. Not that you can remember? 12 A. Not that I can remember. 13 Q. Do you have any reason to believe 14 Ms. Melinda is not an honest person? 15 A. Yes. 16 Q. And what is that? 17 A. Simply because the basis of this, 18 I don't feel like I was treated fair as regards 19 to my work and my rate of pay, you know, while 20 I was there. And we, you know, we used to say 21 something all the time, but it didn't make any 22 difference. 23 Q. Who did you say something to?</p>	<p>1 A. I want to say more money than I 2 was actually being paid, simply because of the 3 time that I worked, not something just given to 4 me, what I had worked for. 5 Q. Were you doing a lot of general 6 maintenance and housekeeping stuff? 7 A. Yes. From what I can remember. 8 Q. Is that a pretty accurate general 9 description of what you would have done inside 10 The Lovelady Center? 11 A. Inside the Center? No, I did 12 security. 13 Q. Did you do any housekeeping type 14 things? 15 A. Yes. 16 Q. And maintenance type things? 17 A. Not maintenance. I didn't fix 18 anything. 19 Q. Just housekeeping? 20 A. Yeah. And I did security -- 21 Q. Okay. 22 A. -- in there, like -- 23 Q. Well, that would be part of</p>

<p style="text-align: center;">Page 69</p> <p>1 maintaining the Center, wouldn't it, having 2 some security?</p> <p>3 A. When I am thinking of maintenance, 4 I am thinking of like fixing something.</p> <p>5 Q. Okay.</p> <p>6 A. So do you mean maintenance like 7 repairing something? No, I never repaired 8 anything.</p> <p>9 Q. You helped maintain the Center by 10 picking up, making sure that it was clean, 11 making sure that general chores were done, that 12 type of thing?</p> <p>13 A. Yes, that was part of my work.</p> <p>14 Q. That was part of what you are 15 considering to be your work for Lovelady?</p> <p>16 A. That was my work.</p> <p>17 Q. That was your work?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. If you look at what I have 20 marked as Defendants' Exhibit 2, there's a line 21 on there that says that The Lovelady would 22 receive your food stamps. Do you see that?</p> <p>23 A. I do.</p>	<p>1 Q. In addition to your initial intake 2 fee, that covered you living there and food and 3 a variety of other things that would go along 4 day-to-day, counseling, all the things that 5 would be into the program, right?</p> <p>6 A. I'm not sure.</p> <p>7 Q. You didn't know --</p> <p>8 A. I don't know if I was made aware 9 of that at the time.</p> <p>10 Q. Let's look at the first line on 11 there. Do you see that? "I am responsible for 12 paying an intake fee of five hundred, and I 13 also must pay four hundred and fifty, which 14 covers the first three weeks." Do you see 15 that?</p> <p>16 A. Yes.</p> <p>17 Q. Are those your initials, MB, right 18 next to that?</p> <p>19 A. Yes.</p> <p>20 Q. And your signature on the bottom 21 where it says "resident's signature"?</p> <p>22 A. Yes.</p> <p>23 Q. So you were aware of that, right?</p>
<p style="text-align: center;">Page 70</p> <p>1 Q. Did you receive food stamps?</p> <p>2 A. They did for me.</p> <p>3 Q. You filled out a form asking for 4 food stamps, correct?</p> <p>5 A. Yes.</p> <p>6 Q. And you got approved for food 7 stamps?</p> <p>8 A. I did.</p> <p>9 Q. And did you turn those over to 10 Lovelady?</p> <p>11 A. I did.</p> <p>12 Q. Was that to help pay for your food 13 while you were there?</p> <p>14 A. As far as I can recall.</p> <p>15 Q. Okay. This document, Exhibit 2, 16 also says you were paid zero dollars and five 17 hundred dollars balance would be billed to you; 18 is that correct?</p> <p>19 A. Let me see. Okay. At the bottom? 20 That's correct.</p> <p>21 Q. And so you were having to pay a 22 fee each week to be a part of the program?</p> <p>23 A. Yes.</p>	<p>1 A. Yes, I was aware of that.</p> <p>2 Q. And then it says, "I am 3 responsible to pay a hundred fifty dollars or 4 forty percent of my gross pay for participating 5 in the program." That is on the second line. 6 Do you see that?</p> <p>7 A. Now, that, I wasn't made aware of 8 that.</p> <p>9 Q. Okay. Well, you --</p> <p>10 A. I didn't understand what -- what 11 they were talking about.</p> <p>12 Q. Let's just read this, okay, with 13 me?</p> <p>14 A. Okay.</p> <p>15 Q. "I understand I am responsible to 16 pay a hundred fifty dollars or forty percent of 17 my gross pay, depending on my specific program, 18 weekly for participating in the program." Am I 19 reading that correctly?</p> <p>20 A. Yes.</p> <p>21 Q. And right next to that there's a 22 little line that has got two initials. What 23 are those initials?</p>

1 A. MB.
 2 Q. Are those your initials?
 3 A. Those are my initials, yes.
 4 Q. And then it has got your signature
 5 on the bottom of this document, correct?
 6 A. Yes.
 7 Q. So you were, in fact, aware of
 8 that, right? Because it says here, "I
 9 understand it," and you initialed and signed
 10 it.
 11 A. I initialed this and I signed
 12 this, but I wasn't like -- I didn't know my
 13 rights at this time. I didn't understand all
 14 what went into it.
 15 Q. Okay.
 16 A. Because really, honestly, it
 17 was -- the financial -- the financial part of
 18 it was really way above my head because it was
 19 times I was thousands of dollars behind on
 20 rent, so --
 21 Q. All I am asking is, those are your
 22 initials and your signature on that?
 23 A. They are.

1 Q. Okay. Are you suing The Lovelady
 2 Center?
 3 A. But I wasn't made aware of my
 4 rights at the time when I signed this.
 5 Q. I am just asking you, are you
 6 suing The Lovelady Center?
 7 A. I am involved in a case where I
 8 was working overtime and I was not getting paid
 9 to work overtime. So I am not -- I can't say
 10 exactly if it is The Lovelady Center, is it
 11 their fault? So I don't know.
 12 Q. You don't know if it was The
 13 Lovelady Center's fault or not?
 14 A. I mean I know it is their fault
 15 because I was there at The Lovelady Center and
 16 I worked for The Lovelady Center. But I am
 17 here simply to get money that was owed to me.
 18 Q. Do you know who you are suing?
 19 A. My -- who I worked for.
 20 Q. Okay. Who was that?
 21 A. The Lovelady Center.
 22 Q. Okay. So you are suing The
 23 Lovelady Center?

1 Q. The one that says "I understand"?
 2 A. Yes.
 3 (Defendants' Exhibit 3 was marked
 4 for identification.)
 5 Q. (BY MR. MILLER:) I will show you
 6 what I'm going to mark as Defendants'
 7 Exhibit 3. Is that your signature on that
 8 document?
 9 A. It is.
 10 Q. And it says you were voluntary or
 11 court-ordered admission to The Lovelady Center.
 12 Do you see that on the top?
 13 A. I do.
 14 Q. You were voluntary; is what you
 15 told me?
 16 A. Voluntary, self.
 17 Q. And it says that you were eligible
 18 for residential rehabilitation, right?
 19 A. Yes.
 20 Q. There's a line on there, Number 5,
 21 that says, "I waive my rights to claim suit
 22 against The Lovelady Center." Do you see that?
 23 A. I do.

1 A. Yes.
 2 Q. Okay. Does your church give any
 3 money to The Lovelady Center?
 4 A. My church?
 5 Q. Uh-huh.
 6 A. I don't belong to a church.
 7 Q. Or the one you went to before,
 8 Temple.
 9 A. No.
 10 Q. Do you know if any churches give
 11 money?
 12 A. I don't know.
 13 Q. I know my church does. Did you
 14 ever see anybody there from Vestavia Baptist
 15 Church at The Lovelady Center?
 16 A. Not Vestavia.
 17 Q. Any of the other Baptist churches?
 18 A. No.
 19 Q. You know churches, they had people
 20 that would show up and volunteer, right?
 21 A. Yeah.
 22 Q. And they would give some money, to
 23 your knowledge?

1 A. I don't know.
 2 Q. You didn't know --
 3 A. I haven't seen any exchange of
 4 monies.
 5 Q. Okay. You don't know where they
 6 get their money?
 7 A. No.
 8 Q. Do you want to sue the --
 9 A. Well, from us, you know, the
 10 clients.
 11 Q. Yeah, do you think that is enough,
 12 what you were paying, would that be enough to
 13 pay for all the services they provided to you,
 14 a hundred fifty dollars a week?
 15 A. Services like what?
 16 Q. Well, living there, food,
 17 counseling, all the staff that was there.
 18 A. I think it was too much.
 19 Q. A hundred fifty dollars a week was
 20 too much?
 21 A. Yeah.
 22 Q. Do you know what Bradford costs,
 23 if you were to go to rehabilitation there?

1 A. No.
 2 Q. You understood when you signed
 3 these documents that this was required of you
 4 in order to enter the program?
 5 A. No, not at the time.
 6 Q. Oh, you didn't?
 7 A. No.
 8 Q. You thought they were just having
 9 you sign them? Why did you think they had you
 10 sign them?
 11 A. I mean like when you go anywhere,
 12 do anything with a company, they have you sign
 13 papers. Like I guess like as far as like to --
 14 to verify that you were there and that this was
 15 that person and in a lot of cases, such as
 16 these, to cover their end, you know.
 17 Q. Okay. You told me you did live
 18 on-site.
 19 A. I did.
 20 Q. But you didn't have any children
 21 who lived there with you.
 22 A. No.
 23 Q. Did they ever come and visit you?

1 MR. CAMP: Objection. Get back on
 2 track, please. This has nothing to do with her
 3 employment.
 4 MR. MILLER: Just object to the
 5 form.
 6 A. I object.
 7 Q. (BY MR. MILLER:) No, you can't.
 8 Overruled.
 9 MR. CAMP: No, you can't --
 10 Q. (BY MR. MILLER:) Do you know how
 11 much it would cost to go to Bradford?
 12 MR. CAMP: Same objection.
 13 Q. (BY MR. MILLER:) You can answer.
 14 A. I don't.
 15 Q. Did you think Lovelady was taking
 16 any risk bringing in people who were addicted
 17 to drugs, having them all there together? Was
 18 there any risk involved with that?
 19 A. Risk like what?
 20 Q. Like that they could get hurt or
 21 that they might do something that they
 22 shouldn't do that would cause The Lovelady to
 23 have some liability?

1 A. Yes, on the weekends.
 2 Q. Could they stay overnight?
 3 A. Yes.
 4 Q. So they did come and stay
 5 overnight with you there?
 6 A. Yes.
 7 Q. Did you have to pay extra for them
 8 when they came?
 9 A. No.
 10 Q. Was there some child care for them
 11 if you needed it?
 12 A. Child care?
 13 Q. Through the Center.
 14 A. Yes, there was some provided
 15 through the Center, but my children didn't --
 16 they couldn't use those services.
 17 Q. They couldn't?
 18 A. No.
 19 Q. Why not?
 20 A. Because the -- the hours that I
 21 would have needed them, the KidZone was not
 22 open. Because I primarily -- I worked
 23 overnight. But most of the time if I knew my

1 kids were coming for the weekend, I did not
 2 work. I scheduled off. And if I could not
 3 schedule off, I would have my roommate watch my
 4 kids.

5 Q. And your roommate would do that
 6 for you?

7 A. Yes.

8 Q. Would you ever watch anybody
 9 else's children when they needed help?

10 A. Yes.

11 Q. As a favor or --

12 A. Yes.

13 Q. Is that something y'all did for
 14 each other? Y'all were all kind of in the same
 15 boat, people who were enrolled in the program,
 16 right?

17 A. Yes.

18 Q. Did y'all sort of help each other
 19 out or try to?

20 A. Yes. Try.

21 Q. Was it that kind of environment, I
 22 mean, that you wanted to help each other out,
 23 everybody wanted each other to succeed, to get

1 through it?

2 A. I can't speak for anybody else,
 3 just for myself.

4 Q. Were you encouraged to help each
 5 other out?

6 A. No, we weren't encouraged. It was
 7 just more so of if you were asked and you could
 8 do it, you did it. And if you couldn't do it,
 9 you didn't do it.

10 Q. Who fed your children when they
 11 came and visited you?

12 A. My kids are so picky they brought
 13 their own food. And I would buy outside food.
 14 Their dad would send money with them, and I
 15 bought food from restaurants.

16 Q. So could you do that, you were
 17 allowed to buy food and bring it in?

18 A. Yes, that is what I did most of
 19 the time because I didn't like their food.

20 Q. You didn't like Lovelady food?

21 A. No.

22 Q. Is that a no?

23 A. No.

1 Q. Let's talk about when you were
 2 there, the services that were involved. You
 3 had rehabilitation; is that right?

4 A. Yes.

5 Q. Trying to get clean, get sober?

6 A. Yes.

7 Q. That was something that was
 8 worthwhile to you, to try to get clean?

9 A. Yes.

10 Q. You had counseling?

11 A. That was required.

12 Q. That was required as part of the
 13 program?

14 A. Part of the program.

15 Q. How often did you go to
 16 counseling?

17 A. We had to schedule a counseling
 18 appointment -- I can't put it in for how often
 19 you had to, but you just had to have so many
 20 signatures on the piece of paper.

21 Q. And then you had job services that
 22 was part of --

23 A. Yes, job placement.

1 Q. Was there some training and a
 2 program called job readiness?

3 A. I don't remember that.

4 Q. You don't remember job readiness?

5 A. No.

6 Q. Or something similar to that that
 7 helped you get ready to go out and get a job?

8 A. No.

9 Q. Wasn't that part of the reason you
 10 submitted that resume online?

11 A. Yes. But I didn't need to get
 12 ready. I already knew how to apply for a job.
 13 I just did that to get a signature on a piece
 14 of paper.

15 Q. You didn't need to get ready to go
 16 out in the workforce?

17 A. No.

18 Q. But you didn't have a job when you
 19 showed up?

20 A. No.

21 Q. And had you created a resume
 22 before?

23 A. Yes.

<p style="text-align: center;">Page 85</p> <p>1 Q. You did?</p> <p>2 A. I already had my resume.</p> <p>3 Q. Do you have a resume right now?</p> <p>4 A. Not with me. I have one.</p> <p>5 Q. A current, up-to-date resume?</p> <p>6 A. It is not up to date.</p> <p>7 Q. When did you last update it?</p> <p>8 A. 2011.</p> <p>9 Q. So you enrolled in Lovelady in</p> <p>10 2012 and the last time you had updated your</p> <p>11 resume was 2011?</p> <p>12 A. (Nodding.)</p> <p>13 Q. Is that correct?</p> <p>14 A. Yes.</p> <p>15 Q. And other than the one you did at</p> <p>16 Lovelady that was submitted online to the State</p> <p>17 of Alabama agency, you haven't ever done</p> <p>18 another resume?</p> <p>19 A. No.</p> <p>20 Q. Is that correct?</p> <p>21 A. That's correct.</p> <p>22 Q. What about money management, did</p> <p>23 you have some classes on managing your money,</p>	<p style="text-align: center;">Page 87</p> <p>1 A. I can't tell you one way or</p> <p>2 another.</p> <p>3 Q. Okay. Transportation, is that</p> <p>4 something that was provided or that you paid</p> <p>5 for when you were there?</p> <p>6 A. Yes.</p> <p>7 Q. Well, they deducted it from your</p> <p>8 fees. So if you were going to be transported</p> <p>9 somewhere, you paid for it?</p> <p>10 A. Yes.</p> <p>11 Q. Just like you would if you weren't</p> <p>12 living there, if you wanted to take a bus</p> <p>13 somewhere or a cab somewhere, you would pay for</p> <p>14 it, right?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. As I understand it, when</p> <p>17 you first come in, there's something called</p> <p>18 Phase I; is that correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Is that the first thirty days?</p> <p>21 A. Yes.</p> <p>22 Q. Or I guess it could go longer if</p> <p>23 you didn't progress past Phase I?</p>
<p style="text-align: center;">Page 86</p> <p>1 managing your finances?</p> <p>2 A. No, I didn't.</p> <p>3 Q. You didn't do any of that?</p> <p>4 A. No.</p> <p>5 Q. What about interviewing skills,</p> <p>6 did you have any classes on that?</p> <p>7 A. No.</p> <p>8 Q. No? What about how to dress,</p> <p>9 professional dress, any kind of training or</p> <p>10 classes on that while you were at Lovelady?</p> <p>11 A. No.</p> <p>12 Q. No? Okay. Other educational</p> <p>13 courses, did you take any type of educational</p> <p>14 training when you were there?</p> <p>15 A. No.</p> <p>16 Q. Religious services, did you go to</p> <p>17 religious --</p> <p>18 A. Yes.</p> <p>19 Q. -- services and --</p> <p>20 A. You had to.</p> <p>21 Q. You had to?</p> <p>22 A. (Nodding.)</p> <p>23 Q. Was that helpful to you?</p>	<p style="text-align: center;">Page 88</p> <p>1 A. That's correct.</p> <p>2 Q. And what you do there is you</p> <p>3 basically get clean, get sober?</p> <p>4 A. I guess. I mean I was already</p> <p>5 sober.</p> <p>6 Q. Well, you tested positive when you</p> <p>7 came in.</p> <p>8 A. I know. But they tested me like</p> <p>9 three days later and I didn't have anything in</p> <p>10 my urine.</p> <p>11 Q. So it was just left over, residual</p> <p>12 things that were in your system?</p> <p>13 A. Yes.</p> <p>14 Q. And it was gone three days later?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Did you later test positive</p> <p>17 while you were at the Center?</p> <p>18 A. Yes. It was some months later,</p> <p>19 like I think about a year, almost.</p> <p>20 Q. When you went to the hospital to</p> <p>21 visit a family member, when you came back, you</p> <p>22 tested positive, right?</p> <p>23 A. Yes.</p>

<p style="text-align: center;">Page 89</p> <p>1 Q. They didn't kick you out of the 2 program, did they? 3 A. No, not at that time. 4 Q. It was after you tested positive 5 again -- 6 A. (Nodding.) 7 Q. -- that you were kicked out of the 8 program, right? 9 A. That's correct. 10 Q. Have you gone to any other 11 programs since Lovelady for rehabilitation? 12 A. No. 13 Q. When you were in Phase I, were you 14 doing any type of work inside The Lovelady or 15 outside? 16 A. Inside The Lovelady. 17 Q. Okay. What were you doing? 18 A. Just chores. 19 Q. What kind of chores? 20 A. Like cleaning up, taking out the 21 trash, that is pretty much what I did. I kept 22 my client rep's office clean. 23 Q. Did you get some type of credit</p>	<p style="text-align: center;">Page 91</p> <p>1 Q. Didn't owe anything? 2 A. No, because they kept my last 3 check. 4 Q. Did you have some money in your 5 pocket when you left? 6 A. No. 7 Q. In your bank account? 8 A. No. 9 Q. Do you have a bank account? 10 A. No. 11 Q. Have you ever had a bank account? 12 A. Yes. 13 Q. When did you last have one? 14 A. 2011. 15 Q. So Phase I, you were basically 16 getting clean, getting acclimated in the 17 program; is that right? 18 A. Yes. 19 Q. Doing some chores internally? 20 A. Yes. 21 Q. And when you did those chores, you 22 were writing your time down? 23 A. No. I wasn't writing the time</p>
<p style="text-align: center;">Page 90</p> <p>1 for that? 2 A. You got a signature. 3 Q. For however many hours you worked? 4 A. Yes. 5 Q. Did sometimes when you did a job, 6 say, take out the trash, did they give you more 7 credit than the time you actually spent? 8 A. No. 9 Q. That never happened to you? 10 A. No. 11 Q. Say if you will take out the 12 trash, we will give you two hours of credit, 13 anything like that? 14 A. No. 15 Q. It was always the actual time that 16 you spent? 17 A. Yes. That is why my fees and 18 stuff got behind when I did start working. 19 Like I said, I was never caught up. I was 20 always behind. They started adding up. 21 Q. When you left, were you caught up 22 or were you behind? 23 A. When I left, I was caught up.</p>	<p style="text-align: center;">Page 92</p> <p>1 down. I was getting signatures from my client 2 rep. She would just sign a piece of paper 3 saying I did that. 4 Q. You did your chores. 5 A. Yes. 6 Q. How many hours were you spending 7 doing chores at that first phase? 8 A. Hours totaling the whole month or 9 daily? 10 Q. That thirty days. 11 A. I don't remember. 12 Q. Was it mostly spent going through 13 counseling and rehab? 14 A. Yeah, and doing the classes that 15 they required you to do. 16 Q. After that thirty days, did you 17 get to the next phase? 18 A. Yes. 19 Q. Phase II? 20 A. Yes. 21 Q. What does Phase II involve? 22 A. I was able to apply for a job at 23 The Lovelady Center to work to where I can --</p>

<p style="text-align: center;">Page 93</p> <p>1 because my client rep, she kept getting on me, 2 on my fees, and my fees was getting high. So I 3 had to apply for, you know, work. So that is 4 when I did The Lovelady security.</p> <p>5 Q. Who did you go talk to about 6 working in security?</p> <p>7 A. Shanae. I can't think of her last 8 name. I just remember Shanae.</p> <p>9 Q. What department or area was she 10 in?</p> <p>11 A. She was over security.</p> <p>12 Q. So you just went and you said I am 13 going to work in security and you went and 14 talked directly to Shanae?</p> <p>15 A. Yes.</p> <p>16 Q. You didn't go through Lovelady's 17 human resources department?</p> <p>18 A. Not that I can remember. I mean 19 she had to. She had to make sure I was cleared 20 to do it.</p> <p>21 Q. Was she an employee of Lovelady?</p> <p>22 A. No. She was actually in the 23 program.</p>	<p style="text-align: center;">Page 95</p> <p>1 Q. Billy club?</p> <p>2 A. Huh-uh.</p> <p>3 Q. You never had to throw anybody on 4 the ground and frisk them?</p> <p>5 A. No. We didn't have to throw them 6 on the ground, but we did have to search them.</p> <p>7 Q. When people came into the Center, 8 you checked to make sure they weren't bringing 9 drugs or guns or anything like that?</p> <p>10 A. Yes.</p> <p>11 Q. And you checked their rooms to 12 make sure people didn't have drugs or anything 13 that they weren't supposed to have?</p> <p>14 A. That's correct.</p> <p>15 Q. At that time when you were in 16 Phase II, were you still going through your 17 counseling and religious services?</p> <p>18 A. Yes. You had to do everything 19 else.</p> <p>20 Q. When you were at Lovelady, did you 21 ever get any type of written employment 22 agreement, saying you are an employee, here is 23 what your job consists of?</p>
<p style="text-align: center;">Page 94</p> <p>1 Q. She was? Shanae was in the 2 program?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Did you fill out an 5 application for security?</p> <p>6 A. No.</p> <p>7 Q. Do you have any security 8 background? Had you ever been a security guard 9 before?</p> <p>10 A. No.</p> <p>11 Q. Any experience at all being 12 security?</p> <p>13 A. For what they needed, yeah.</p> <p>14 Q. What was it that they needed?</p> <p>15 A. I mean just basically when the 16 clients came in or anybody came in to the 17 Center, I just had to check their purses and 18 their bags to make sure they weren't bringing 19 in anything that wasn't allowed in the Center. 20 And I had to do room checks.</p> <p>21 Q. So you weren't carrying a weapon 22 or anything like that?</p> <p>23 A. No.</p>	<p style="text-align: center;">Page 96</p> <p>1 A. Yes. There was a piece of paper I 2 had to sign.</p> <p>3 Q. What did that piece of paper say?</p> <p>4 A. Stating the duties of what I had 5 to do and that I completed them. I had to sign 6 like every night of what I did, like what rooms 7 I checked and what area of the building that I 8 checked. And that was given to like the head 9 lady that was over --</p> <p>10 Q. You were signing a task sheet and 11 said here is what I did today?</p> <p>12 A. Yes.</p> <p>13 Q. But that is not what I am asking 14 about. I appreciate it. Thank you for telling 15 me that. But what I am asking about, did you 16 ever have any type of agreement that said you 17 were going to be an employee of Lovelady and 18 here is what your job is going to be, here is 19 what you are going to be paid, that type of 20 detail and you signed it and they signed it, 21 where you had an agreement like a contract to 22 be an employee?</p> <p>23 A. Well, I was made aware that how</p>

<p style="text-align: center;">Page 97</p> <p>1 they calculated up the hours and how they 2 decided what was the rate of pay and what was 3 on -- how my rent and my fees were going to be 4 handled, yes.</p> <p>5 Q. Okay. Was that done verbally, you 6 talked about it?</p> <p>7 A. From what I can remember, I 8 remember signing something with my client rep.</p> <p>9 Q. You do?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Do you remember what that 12 piece of paper was?</p> <p>13 A. No. I don't. They should have 14 it. They have all these other papers.</p> <p>15 Q. I'm asking you if you have it.</p> <p>16 A. I don't have it.</p> <p>17 Q. Do you remember what it said?</p> <p>18 A. Just describing my work, what I 19 would be doing at that time. I guess they had 20 to have an account for every client, you know, 21 stating what I would be doing and how I would 22 be compensated for what I would be doing.</p> <p>23 Q. How would that work? Tell me how</p>	<p style="text-align: center;">Page 99</p> <p>1 A. I never worked the Success 2 program, no.</p> <p>3 Q. You never worked the Success 4 program?</p> <p>5 A. No.</p> <p>6 Q. What was the Success program?</p> <p>7 A. I don't know. I am reading it 8 now.</p> <p>9 (Pause.)</p> <p>10 A. Yeah, I didn't do the Success 11 program.</p> <p>12 Q. (BY MR. MILLER:) Are you sure?</p> <p>13 A. I am positive.</p> <p>14 Q. Okay. Are you sure the Success 15 program wasn't part of Phase II and that your 16 working security maybe was not part of that?</p> <p>17 A. No, not to my knowledge, no. I 18 never did a two-page summary -- first, I have 19 never seen this.</p> <p>20 Q. Okay. As far as you know, you 21 weren't even in the Success program?</p> <p>22 A. No. I was not in the Success 23 program.</p>
<p style="text-align: center;">Page 98</p> <p>1 you were going to be compensated.</p> <p>2 A. My fees were going to be taken 3 care of, this five hundred dollar intake fee 4 and that nine hundred and fifty dollars that 5 was put upon me while I wasn't working.</p> <p>6 Q. You say put upon you?</p> <p>7 A. Yeah, I mean, you know, that I had 8 incurred while I was not working.</p> <p>9 Q. That you agreed to?</p> <p>10 A. Yeah, I agreed to it. But had I 11 had it that day, it would not have been behind.</p> <p>12 Q. Okay.</p> <p>13 A. And the hundred and fifty dollars 14 or forty percent of my gross pay.</p> <p>15 (Defendants' Exhibit 4 was marked 16 for identification.)</p> <p>17 Q. (BY MR. MILLER:) Let me show you. 18 Did you ever see or sign a piece of paper that 19 looked like this that described the Success 20 program?</p> <p>21 A. No. I never worked the Success 22 program.</p> <p>23 Q. You what?</p>	<p style="text-align: center;">Page 100</p> <p>1 Q. Did you understand that your 2 general chores like housekeeping and the 3 maintenance stuff that you testified about, 4 that you were going to do that without having 5 to be compensated?</p> <p>6 A. No.</p> <p>7 Q. You didn't?</p> <p>8 A. I thought anything that I did, I 9 was going to be compensated for.</p> <p>10 Q. You did?</p> <p>11 A. (Nodding.)</p> <p>12 Q. Okay.</p> <p>13 (Defendants' Exhibit 5 was marked 14 for identification.)</p> <p>15 Q. (BY MR. MILLER:) Is that your 16 signature on this document that I have just 17 given you as Defendants' Exhibit 5?</p> <p>18 A. It is.</p> <p>19 Q. Okay. That is your signature down 20 on the bottom?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. It is dated January 23rd, 23 2012?</p>

<p style="text-align: center;">Page 101</p> <p>1 A. Yes. 2 Q. That would have been when you 3 first came in? 4 A. Yes. 5 Q. There's a witness on there, right? 6 A. Yes. 7 Q. Do you remember signing this 8 document? 9 A. I don't remember signing it. 10 Q. But it is your signature? 11 A. It is. 12 Q. Okay. And it says on here that 13 each resident has the right to know that the 14 performance of all assigned housekeeping and 15 general maintenance duties may be performed 16 without compensation. Do you see that? 17 A. I wasn't aware of that at the 18 time. 19 Q. Well, you did sign this document. 20 A. Yes, I signed a stack of papers 21 that was just thrown in front of me. 22 Q. They were thrown in front of 23 you --</p>	<p style="text-align: center;">Page 103</p> <p>1 Q. (BY MR. MILLER:) Okay. We are 2 going back on the record if you are ready. 3 A. Yes. 4 Q. Ms. Knox will be back in a second. 5 When we went off the record, I think we were 6 talking a little bit about the Success program. 7 You said you didn't remember being in the 8 Success program. 9 A. No. 10 Q. As I understand it, the work that 11 you did, you received money that allowed you to 12 pay for your expenses, the money that you owed 13 the Center. 14 A. Yes. 15 Q. Is that right? 16 A. Yes. 17 Q. Did you ever get to a point where 18 you were making more than what you owed the 19 Center? 20 A. Yes. 21 Q. Okay. 22 A. When I started working at 23 Blackwell's.</p>
<p style="text-align: center;">Page 102</p> <p>1 A. You had to sign them. That is why 2 my signature looked like that. 3 Q. Do you typically sign stuff 4 without reading it? 5 A. If I trust somebody. 6 Q. You just sign it? 7 A. If I feel like I am not getting 8 taken advantage of. And I didn't see any 9 reason I -- not to sign it. 10 Q. So you worked security there. How 11 long did you work security? 12 A. Up until I started working at 13 Blackwell's Way. 14 Q. Okay. When did you start working 15 at Blackwell's Way? 16 A. I think in April of 2013. 17 Q. April of 2013? 18 A. Yes. 19 Q. How did that come about? 20 MR. CAMP: Hold on a second. 21 (Off-the-record discussion.) 22 (Whereupon, a break was had from 23 10:50 a.m. until 10:58 a.m.)</p>	<p style="text-align: center;">Page 104</p> <p>1 Q. Okay. You started working at 2 Blackwell's. Did you have to be in Phase III 3 or was that part of Phase II? 4 A. Honestly, I don't know what phase 5 I was in when I started at Blackwell's. 6 Because I was working so much trying to get my 7 fees down, a lot of the times I didn't get my 8 signatures to phase up. So I couldn't tell you 9 how -- if I was in Phase II or Phase III. 10 Q. Okay. Now, as part of the 11 program, you had to work some voluntary hours, 12 right? 13 A. Yes. 14 Q. That was part of the arrangement? 15 A. That was part of it, but I thought 16 anytime that I worked that I was going to be 17 compensated for it. 18 Q. I'm not asking you what you want 19 to tell me you thought now. I am asking you, 20 when you came in, you understood that you had 21 to do volunteer hours? 22 A. Yes. 23 Q. And that was a requirement of the</p>

<p style="text-align: right;">Page 105</p> <p>1 program in order to graduate, right? 2 A. I guess to phase up, yeah. 3 Q. Well, to graduate? 4 A. To graduate, yes. 5 Q. And those volunteer hours could be 6 at The Lovelady Center or they could be out in 7 the community, correct? 8 A. I'm not sure. 9 Q. Well, did you ever do any 10 volunteer work out in the community? 11 A. No. 12 Q. None at all? 13 A. No. 14 Q. Have you ever done any voluntary 15 work out in the community since you have been 16 at Lovelady Center? 17 A. No. 18 Q. Did you ever do any voluntary work 19 out in the community before? 20 A. No. 21 Q. So tell me about Blackwell's. How 22 did that come about? 23 A. Because my fees were never getting</p>	<p style="text-align: right;">Page 107</p> <p>1 A. Yes. 2 Q. And so you would get in the 3 transportation. You would take the 4 transportation, go to Blackwell's, right? 5 A. Yes. 6 Q. And what would you do when you got 7 there? 8 A. I would do my job. I worked. 9 Q. What was your job? 10 A. To feed -- well, prepare, cook the 11 food for the client, give them their 12 medication, bathe them or change their clothes 13 if they needed -- some of the clients, they 14 could do for themselves; some couldn't. Some 15 of them you just had to watch to, you know, 16 keep them safe. Some of them would try to run 17 out in the middle of the street. 18 Q. When you say clients, what was 19 Blackwell's? What service did they provide? 20 A. They were in like a group home, 21 what was considered a group home for the 22 mentally impaired. 23 Q. Okay. And did you have some</p>
<p style="text-align: right;">Page 106</p> <p>1 caught up, my client rep suggested that I apply 2 for an outside job at Blackwell's. 3 Q. And how did you apply for that? 4 A. I went to job placement and told 5 them that I wanted to work at Blackwell's. And 6 that is it. 7 Q. And then what happened? 8 A. I started working at Blackwell's. 9 Q. Okay. Where was Blackwell's 10 located? 11 A. In Pinson, Trussville. 12 Q. Okay. And did you take a bus that 13 took you there or a car or how did you get 14 there? 15 A. Transportation, The Lovelady 16 transportation. 17 Q. Did they provide it, Lovelady 18 provided you transportation there and back? 19 A. Yes. 20 Q. Was that part of your fee, your 21 weekly fee, that transportation? 22 A. It was included. 23 Q. It was included?</p>	<p style="text-align: right;">Page 108</p> <p>1 training out at Blackwell's when you got there 2 about what you were supposed to do? 3 A. Yes. 4 Q. Okay. Who gave you that training? 5 A. I don't remember their name. They 6 were at Haymon Homes, H-A-Y-M-O-N-S. 7 Q. Did you ever work at Haymon Homes? 8 A. I did my training at Haymon Homes. 9 Q. Okay. 10 A. But I didn't actually go out to 11 the house at Haymon Homes. I came right back 12 to go to Blackwell's. 13 Q. Was it a person who was at 14 Lovelady who trained you for Blackwell's or was 15 it somebody who worked at Blackwell's or 16 Haymon? 17 A. Somebody that worked at 18 Blackwell's or Haymon. 19 Q. They told you what jobs you needed 20 to do, how you needed to do it, that type of 21 thing? 22 A. And they certified us for -- to 23 give medication. You had to take a test in</p>

<p style="text-align: right;">Page 109</p> <p>1 order to be able to give medication to one of 2 the residents.</p> <p>3 Q. And you had some nursing training 4 already, right?</p> <p>5 A. Yes.</p> <p>6 Q. So that was helpful, you were 7 able --</p> <p>8 A. Yes.</p> <p>9 Q. Did that give you a leg up on 10 knowing what to do, do you feel like?</p> <p>11 A. Not really, no.</p> <p>12 Q. So you went through the training.</p> <p>13 A. (Nodding.)</p> <p>14 Q. Is that a yes?</p> <p>15 A. Yes.</p> <p>16 Q. And then once you completed the 17 training, you actually went and worked at 18 Blackwell's?</p> <p>19 A. I did.</p> <p>20 Q. And that is not on the same 21 location as Lovelady, right, not the same --</p> <p>22 A. No. Haymon Homes is in -- it is 23 in another part of Alabama. I can't think of</p>	<p style="text-align: right;">Page 111</p> <p>1 were going to go to each day? She would give 2 you your assignment?</p> <p>3 A. Well, she told -- I can't remember 4 who it was at job placement at that time. 5 Somebody at job placement in The Lovelady put 6 this person at this house.</p> <p>7 Q. Okay.</p> <p>8 A. She communicated to that person. 9 And the person in job placement, there was so 10 many of them -- it first started out Holly, and 11 then two more girls ended up being in there 12 because some of them got dismissed or whatever. 13 And they would give us our schedule and tell us 14 where to work.</p> <p>15 Q. That came from Blackwell's, they 16 communicated it to --</p> <p>17 A. To somebody at The Lovelady.</p> <p>18 Q. So they could organize it so 19 everybody would know where they were supposed 20 to go?</p> <p>21 A. Yes.</p> <p>22 Q. So you would get right there each 23 day?</p>
<p style="text-align: right;">Page 110</p> <p>1 where. But --</p> <p>2 Q. Okay.</p> <p>3 A. It was like about an hour drive.</p> <p>4 Q. Okay. When you got there each day 5 at Blackwell's, did you go see somebody and 6 find out where you were assigned for that day 7 or what you were supposed to do or how did that 8 work?</p> <p>9 A. No. That was already given to us. 10 We already knew the house that we were going to 11 work at, unless something changed at the last 12 minute.</p> <p>13 Q. Who told you what house you were 14 going to work at?</p> <p>15 A. The supervisor.</p> <p>16 Q. Okay. Who was your supervisor?</p> <p>17 A. LaDedra Colvin.</p> <p>18 Q. And who did she work for?</p> <p>19 A. Blackwell's Way.</p> <p>20 Q. And had she been there a long 21 time?</p> <p>22 A. I'm not sure. I don't remember.</p> <p>23 Q. So she told you what house you</p>	<p style="text-align: right;">Page 112</p> <p>1 A. Yes.</p> <p>2 Q. So you wouldn't have to come in 3 and figure out where you were going and all 4 that?</p> <p>5 A. Yes.</p> <p>6 Q. When you went, was there somebody 7 who you reported to on a day-to-day basis at 8 Blackwell's who was your supervisor?</p> <p>9 A. Not that I reported to. But if 10 you needed something, there was somebody, a 11 nurse you can call.</p> <p>12 Q. Was the nurse your supervisor?</p> <p>13 A. No, she wasn't my supervisor.</p> <p>14 Q. Who looked over you while you were 15 at Blackwell's?</p> <p>16 A. Well, while we were in the homes, 17 it was just us and the clients.</p> <p>18 Q. But if you had an issue, who did 19 you go to?</p> <p>20 A. While we were at work?</p> <p>21 Q. Yes.</p> <p>22 A. I would go to -- I would call the 23 nurse.</p>

<p style="text-align: center;">Page 113</p> <p>1 Q. And what kind of things would you 2 call the nurse for? 3 A. If it was a medication error, if 4 one of the clients acted out and needed medical 5 attention or something. 6 Q. All right. If you had a question 7 about something, what am I supposed to do in 8 this situation, who would you call? 9 A. The nurse. 10 Q. Did Lovelady have anybody that 11 they sent up who was in the home with you every 12 day? 13 A. No. 14 Q. You didn't have a supervisor 15 on-site at Blackwell's who worked at Lovelady? 16 A. Not that I can remember. But if I 17 had an issue with anything at any time, I could 18 call my client rep. 19 Q. About anything, right? 20 A. Yes. 21 Q. Okay. How much were you paid at 22 Blackwell's? 23 A. What do you mean like pay?</p>	<p style="text-align: center;">Page 115</p> <p>1 Q. Do you know if Lovelady owned the 2 building where Blackwell's Way was? 3 A. I don't know. 4 Q. Do you know if they owned or 5 leased any of it? 6 A. I don't know. 7 Q. You don't know? Did you 8 understand that the nurse, if you did something 9 you weren't supposed to do, that the nurse at 10 Blackwell's could fire you? 11 A. No. 12 Q. No? 13 A. (Shaking head.) I thought my 14 client rep, you know, told me if I could or 15 couldn't go back to work. 16 Q. Okay. You thought your client 17 rep, who was not with you on a day-to-day 18 basis, right? Is that correct? 19 A. Yes. 20 Q. Didn't observe what you were doing 21 on a day-to-day basis, did she? 22 A. Yes. They could still decide 23 whether or not I could go back to work.</p>
<p style="text-align: center;">Page 114</p> <p>1 Q. Were you paid by the hour? 2 A. An hour? Yes, we were paid 3 hourly. 4 Q. Who decided what your hourly rate 5 was going to be? 6 A. The Lovelady. 7 Q. How do you know that? 8 A. Because they just told us that is 9 what it would, you know, be. Minimum wage, I 10 guess. 11 Q. Okay. So you were paid minimum 12 wage? 13 A. Yes. 14 Q. Do you know how you got paid, how 15 that money came through? Did Blackwell's send 16 it to Lovelady and they then cut a check to 17 you? 18 A. I guess that is how they did it. 19 I'm not sure. 20 Q. You don't even know? 21 A. No. 22 Q. Did you ever ask? 23 A. No.</p>	<p style="text-align: center;">Page 116</p> <p>1 Q. I am asking you, your client rep 2 didn't observe you on a day-to-day basis? 3 A. But they still decided -- 4 Q. Did your client rep observe you on 5 a day-to-day basis? 6 A. Yes, inside the Center. 7 Q. No, at Blackwell's. 8 A. Oh, no. 9 Q. So they wouldn't know if you were 10 doing a good job or not unless somebody at 11 Blackwell's specifically told them, right? 12 A. Yes. 13 Q. Somebody at Blackwell's would have 14 to call and say don't send her back? 15 A. Yes. 16 Q. Is that correct? 17 A. That's correct. 18 Q. Okay. Let's go back a little bit 19 on your chores. Tell me what kind of type of 20 internal chores you did when you were at 21 Lovelady. 22 A. Well, sweep the steps, sweep and 23 mop the entranceway of the Center when you</p>

<p style="text-align: right;">Page 117</p> <p>1 first come in. They had these common areas 2 where you could heat up food. You just have to 3 take the trash out there, clean and wipe down 4 the counters there. Take out trash. Vacuum 5 carpet. What else did I do? That was pretty 6 much it.</p> <p>7 Q. Would you pick what you did? 8 A. No, you was told. 9 Q. Who told you, hey, do this chore? 10 A. The person that was over the 11 chores. 12 Q. Who was over the chores? 13 A. Whoever assigned -- whoever was 14 assigned to give out chores. It wasn't the 15 same person at all times. 16 Q. Have you ever had a job in the 17 outside world, outside Lovelady, where you 18 would have done chores like you did at 19 Lovelady? 20 A. Not -- what do you mean like 21 outside world? 22 Q. Well, in another job, outside for 23 the bank or for Caremark or any of these other</p>	<p style="text-align: right;">Page 119</p> <p>1 Q. So when you were a sitter you did 2 chores? 3 A. Yes. 4 Q. In addition to watching that 5 person? 6 A. Yes. 7 Q. That is a job that you applied 8 for, interviewed for and all that, the Awesome 9 Sitter service? 10 A. Yes. 11 Q. And you didn't live on-site with 12 the person that you were doing the chores for? 13 A. No, I didn't live with them, no. 14 Q. Did some of your chores at 15 Lovelady include picking up after yourself, 16 keeping your room clean, that type of thing? 17 A. Yes, that was required of us. 18 Q. Cleaning common areas that you and 19 others would use? 20 A. Yes. 21 Q. When you did a chore, did you 22 write down your time, keep track of it? 23 A. No, I didn't, but the person that</p>
<p style="text-align: right;">Page 118</p> <p>1 jobs you have done -- 2 A. If I was getting paid for it and 3 it was in my job description. 4 Q. If you what? 5 A. If I was getting paid for it and 6 it was in my job description. 7 Q. But have you ever had a job where 8 your job was to do chores? 9 A. Yes. 10 Q. Okay. What job was that? 11 A. When I worked in the home health 12 agency, we had to clean the client's house, you 13 know, clean up behind them because they 14 couldn't. They were old. Wash their clothes, 15 cook for them. 16 Q. That is where you were doing 17 everything for that particular client? 18 A. Yes. 19 Q. Okay. And when was that? 20 A. When I worked for Awesome Sitter 21 service. 22 Q. Awesome Sitter service? 23 A. Uh-huh.</p>	<p style="text-align: right;">Page 120</p> <p>1 was giving out the chores, they would have a 2 piece of paper from the client rep that had all 3 that client rep's clients listed on it. And 4 they would write what chore they did. And they 5 went behind and checked to make sure that that 6 chore was completed. And that was handed over 7 to my client rep. 8 Q. What was that called? Was that an 9 opportunity credit? 10 A. The chore? 11 Q. (Nodding.) 12 A. No, that was called work. 13 Q. How did you get an opportunity 14 credit? Didn't you have a sheet called 15 opportunity credits? 16 A. Yes. 17 Q. And what did you use that for? 18 A. That was when I first started 19 working for Carraway, doing the security at 20 Carraway. 21 Q. At Carraway? 22 A. Yes. 23 Q. When you were at Lovelady?</p>

<p style="text-align: center;">Page 121</p> <p>1 A. Yes. 2 Q. When you say Carraway, was that 3 the location? 4 A. That was their other location. We 5 went over there and were supposed to keep folks 6 off the property. 7 Q. So when you were doing the 8 security work at Carraway, you filled out a 9 sheet that was called opportunity credits? 10 A. Yes. 11 Q. Let me show you one. 12 (Defendants' Exhibit 6 was marked 13 for identification.) 14 Q. (BY MR. MILLER:) We are on 6? 15 A. Yes. 16 Q. Is that the type of sheet that you 17 would have for an opportunity credit? 18 A. Yes. 19 Q. What does this show? Go through 20 this with me and tell me what it shows. 21 A. It is showing -- what do you mean? 22 Q. Well, when you were working 23 security, you were writing down the time that</p>	<p style="text-align: center;">Page 123</p> <p>1 A. I'm sorry. I didn't date it, but 2 it's dated by Shanae. 3 Q. (BY MR. MILLER:) You understood 4 that some of your work that you did internally 5 was going to get credited toward your volunteer 6 hours? 7 A. No, I didn't. 8 Q. You didn't? Where did you think 9 you were going to get those volunteer hours if 10 you weren't going outside to do any -- 11 A. I didn't think I was volunteering 12 to do anything. 13 Q. Oh, you didn't? 14 A. No. 15 Q. You didn't think you had to do any 16 volunteer hours; is that your testimony? 17 A. Not while I was working, no. 18 Q. When were you going to do them if 19 it wasn't when you were working? How were you 20 going to get those volunteer hours? 21 A. I don't know. 22 Q. They were just going to magically 23 appear?</p>
<p style="text-align: center;">Page 122</p> <p>1 you started and the time you stopped? 2 A. Yeah, the time I started and the 3 time I break for lunch and then the time I go 4 back in. 5 Q. And this shows ten of those hours 6 were considered to be voluntary hours? 7 A. I don't know because when I signed 8 this, only twenty-five was there. That minus 9 ten wasn't there. This was added after. 10 Q. The twenty-five was there? 11 A. Yes. 12 Q. Okay. How do you remember what 13 was on there when you signed it? 14 A. Because I would have asked her why 15 she is taking ten off. 16 Q. Do you remember signing this on 17 March 18th, 2013? 18 A. Mine says April the 2nd, 2013. 19 Q. Oh, you have got the April. Okay. 20 April 2nd, 2013? 21 A. Yes. I didn't date it. It was 22 dated by Shanae. 23 THE REPORTER: I'm sorry?</p>	<p style="text-align: center;">Page 124</p> <p>1 A. I didn't think they were going to 2 magically appear. I just wasn't thinking about 3 them at that time. 4 Q. But you knew that you had to have 5 them to graduate? 6 A. Yes. 7 Q. And that that was part of the 8 program? 9 A. But I was always working to get my 10 fees down to even maintain at the Center. If I 11 didn't work to get the fees down, I was going 12 to be dismissed for nonpayment. 13 Q. And you understood that that was 14 part of the program, though, was to do 15 volunteer work, have a certain number of 16 volunteer hours? 17 A. Yes, but I don't remember when the 18 volunteer hours were due. Just I knew I had to 19 have them. But at this time, I was working to 20 pay my rent. I wasn't volunteering for 21 anything. 22 Q. You weren't? 23 A. No.</p>

<p style="text-align: right;">Page 125</p> <p>1 Q. And you have never volunteered for 2 anything, as I understand it today; is that 3 right?</p> <p>4 A. No.</p> <p>5 Q. Is that correct?</p> <p>6 A. I was working.</p> <p>7 Q. Is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. You have never done any volunteer 10 work?</p> <p>11 A. No.</p> <p>12 Q. Do you know anything about how the 13 pay arrangement worked when you were working 14 out at Blackwell's?</p> <p>15 A. What do you mean?</p> <p>16 Q. How did you get paid?</p> <p>17 A. The Lovelady cut a check and gave 18 it to us. Went to accounting on I think the 19 15th of every month and gave us a check.</p> <p>20 Q. Okay. Did you check that, look at 21 how much you were paid as against the hours 22 that you worked?</p> <p>23 A. Yes.</p>	<p style="text-align: right;">Page 127</p> <p>1 A. No.</p> <p>2 Q. You can't tell me any specific 3 week that you complained?</p> <p>4 A. No.</p> <p>5 Q. Is that correct?</p> <p>6 A. That's correct.</p> <p>7 Q. All right. Do you know who 8 actually worked for Lovelady's, who was on the 9 staff? Can you name some of them?</p> <p>10 A. Yes.</p> <p>11 Q. All right. Who can you name?</p> <p>12 A. Just like anywhere?</p> <p>13 Q. Uh-huh.</p> <p>14 A. The client reps, want me to name 15 all my client reps?</p> <p>16 Q. I just wanted to ask you, your 17 client reps, they weren't enrolled in the 18 program at the time they were your client reps?</p> <p>19 A. No, they were staff.</p> <p>20 Q. So there was a difference between 21 staff and people who were enrolled? You knew 22 some people were staff and some people were 23 enrolled, correct?</p>
<p style="text-align: right;">Page 126</p> <p>1 Q. Did you ever complain about hey, I 2 don't think I am getting enough?</p> <p>3 A. Yes.</p> <p>4 Q. Who did you complain to?</p> <p>5 A. I don't remember her name but 6 somebody in job placement.</p> <p>7 Q. Do you remember when it was that 8 you complained?</p> <p>9 A. Almost every pay period.</p> <p>10 Q. Do you remember any specific ones?</p> <p>11 A. My hours were not right.</p> <p>12 Q. Do you remember any specific dates 13 that you complained to the person who you can't 14 remember in job placement?</p> <p>15 A. Not right now, no.</p> <p>16 Q. Just I want to make sure I am 17 clear. So you don't know who you complained to 18 or specifically when you complained?</p> <p>19 A. Somebody in job placement who was 20 over at that time during anytime that I was 21 working.</p> <p>22 Q. You complained every single time, 23 every single week?</p>	<p style="text-align: right;">Page 128</p> <p>1 A. I mean I knew some people that 2 were in the program but were still working but 3 at a different level.</p> <p>4 Q. They weren't staff of Lovelady 5 Center?</p> <p>6 A. What do you mean they weren't 7 staff?</p> <p>8 Q. Well, there were some people who 9 weren't enrolled in the program who worked for 10 Lovelady?</p> <p>11 A. Yes.</p> <p>12 Q. Like Melinda, people like that. 13 That is what I consider to be staff.</p> <p>14 A. Yes.</p> <p>15 Q. You understand what I mean by 16 staff, right?</p> <p>17 A. Yes. Well, I didn't consider her 18 staff. She owned the place. So no, I don't 19 consider her staff. She owned it.</p> <p>20 Q. You don't consider her staff? Oh, 21 she owned it?</p> <p>22 A. Yeah, she ran it, you know, ran 23 it.</p>

<p style="text-align: center;">Page 129</p> <p>1 Q. Do you know she owned it? 2 A. Yeah. 3 Q. You do? 4 A. I mean anytime -- I feel like 5 anytime somebody is the head, they have the big 6 office, then yeah -- 7 Q. Then they own it? 8 A. Yeah. And they tell everybody 9 what to do, (nodding). 10 Q. Okay. Any other staff members you 11 can think of who weren't enrolled in the 12 program but who worked there? 13 A. No. 14 Q. You can't think of any others? 15 A. (Shaking head.) 16 Q. Did you think that being at The 17 Lovelady was worthwhile, The Lovelady Center? 18 A. It didn't impact me negatively nor 19 positively. It didn't do one way or another. 20 Q. But you just stayed there? 21 A. (Nodding.) 22 Q. Why did you stay? 23 A. For one, I was working, you know.</p>	<p style="text-align: center;">Page 131</p> <p>1 have been? 2 A. At their father's house. 3 Q. Do you know who determined what 4 your wage rate was going to be at Blackwell's? 5 A. I guess The Lovelady. 6 Q. Do you know? 7 A. No. 8 Q. Okay. And you don't know whether 9 or not Blackwell's was owned or leased by 10 Lovelady? 11 A. No. 12 Q. When you went to Blackwell's, did 13 they provide everything that you needed to do 14 the job there? 15 A. Yes. 16 Q. Okay. Did Lovelady send you with 17 the type of equipment or stuff that you needed 18 to do the job or was that all there at 19 Blackwell's? 20 A. That was all there. 21 Q. At Blackwell's? 22 A. Yes. 23 Q. Did you ever work at Haymon Homes</p>
<p style="text-align: center;">Page 130</p> <p>1 And it did -- I take that back. It did kind of 2 help me as far as my kids but -- 3 Q. As far as your kids? 4 A. Yes, being able to visit with 5 them. 6 Q. You couldn't have visited with 7 your kids if you weren't in the program? 8 A. I could have. I could have. 9 Q. How did it help you? 10 A. But they were able to come -- to 11 come, you know, there and it just be us and not 12 somebody else around. 13 Q. You didn't have to have somebody 14 else there for visitation? 15 A. Yes. 16 Q. And that is something you couldn't 17 have done if you weren't enrolled in the 18 program? 19 A. I could have. 20 Q. Well, then -- 21 A. It just would have been a 22 different environment is what I am saying. 23 Q. What kind of environment would it</p>	<p style="text-align: center;">Page 132</p> <p>1 or just train there? 2 A. No. I just trained. 3 Q. Can you tell me how many people 4 you think have been not paid what they should 5 be paid? 6 A. No. I don't know how many. 7 Q. You don't have any idea? 8 A. No. 9 Q. Do you remember signing a 10 declaration in this case, something called a 11 declaration? 12 (Defendants' Exhibit 7 was marked 13 for identification.) 14 Q. (BY MR. MILLER:) I will show you 15 what I am going to mark as Defendants' 16 Exhibit 7. 17 A. Yes. 18 Q. Do you remember this? 19 A. Yes. 20 Q. Did you type that up? 21 A. This is not mine. 22 Q. What? 23 A. This is not mine.</p>

<p style="text-align: right;">Page 133</p> <p>1 Q. Oh, I gave you the wrong one. 2 That wouldn't be yours. Let me give you the 3 right one. Do you remember doing one? 4 A. Yes. 5 Q. Did you type it up? 6 A. Those are my answers, yes. 7 Q. Did you type it up? 8 A. No, I didn't type it up. 9 Q. You told your lawyers what to put 10 on it? 11 A. I answered the questions that I 12 was asked, yes. 13 Q. Did you read it before you signed 14 it? 15 A. I did. 16 Q. Did you understand that it was 17 submitted as a declaration and it is submitted 18 under penalty of perjury? 19 A. Yes. 20 Q. Okay. Let me show you. Is that 21 your declaration there? 22 A. It is. 23 Q. Is that your signature on the end?</p>	<p style="text-align: right;">Page 135</p> <p>1 Q. Talk to an investigator? 2 A. No. 3 Q. So am I right that you think 4 Melinda owns Lovelady? 5 A. Yes. 6 Q. Okay. 7 A. That is what I said. That is what I believe, yes. 8 Q. And you are suing Lovelady? 9 A. Yes. 10 Q. So you are suing Melinda? 11 MR. CAMP: Objection. 12 A. No. 13 Q. (BY MR. MILLER:) No? You don't 14 think you are suing her? 15 A. I am not suing Melinda MeGahee. I 16 am not suing her, no. 17 Q. Do you think she did anything 18 wrong? 19 MR. CAMP: Asked and answered. 20 A. If she knew of -- 21 Q. (BY MR. MILLER:) If she knew 22 what? 23</p>
<p style="text-align: right;">Page 134</p> <p>1 A. Yes. 2 Q. Do you want to revoke your 3 declaration here now that you are under oath or 4 do you want to stand by it? 5 A. Stand by it. 6 Q. Okay. Do you have any type of 7 audio recordings of anything that happened at 8 Lovelady or Blackwell's -- 9 A. No, I don't. 10 Q. -- to support your claim? Do you 11 have any documents other than what you have 12 given your lawyers that you would believe 13 supports your case? 14 A. Not that I can think of at this 15 time. 16 Q. Well, do you? You don't know of 17 any others? 18 A. No. No. Not at this time. 19 Q. Did you have any communication 20 with the U.S. Department of Labor? 21 A. No. 22 Q. Involved in an audit with them? 23 A. No.</p>	<p style="text-align: right;">Page 136</p> <p>1 A. Yes, I believe she -- yes. 2 Q. What did she do wrong? 3 A. Working us and not paying us, not 4 compensating us. 5 Q. You worked and you didn't get paid 6 for it? 7 A. Not the correct compensation, no. 8 Q. What was -- 9 A. I worked overtime and didn't get 10 paid overtime, time and a half. No, I didn't. 11 Q. And that is something you have 12 learned about since being in this case? 13 A. No. 14 Q. About the requirement for 15 overtime? 16 A. No, I have always known about 17 overtime with all my jobs because I have always 18 been compensated time and a half. Sometimes 19 double time. 20 Q. Oh, you have, double time? 21 A. Yes. 22 MR. MILLER: All right. Let's 23 take a break for just a minute.</p>

<p style="text-align: right;">Page 137</p> <p>1 (Whereupon, a break was had from 2 11:31 a.m. until 11:41 a.m.) 3 Q. (BY MR. MILLER:) Are you ready to 4 go back on the record? 5 A. Yes. 6 Q. You understand you are still under 7 oath? 8 A. Yes. 9 Q. What evidence do you have that 10 Blackwell's withheld money from your pay? 11 A. What? 12 Q. Do you have any evidence that 13 Blackwell's withheld money from your pay? 14 A. That Blackwell's withheld money 15 from my pay? 16 Q. Uh-huh. 17 A. No. 18 Q. What about do you have any 19 evidence that Lovelady withheld money from your 20 pay? 21 A. Not that I can think of. No, I 22 have like paycheck stubs. 23 Q. Okay. And they show that money</p>	<p style="text-align: right;">Page 139</p> <p>1 Q. Okay. But that is taking you out 2 of the program. Do you have any evidence that 3 your client rep could fire you from Blackwell's 4 because of your performance there? 5 A. No. 6 Q. You understood when you came into 7 the program at Lovelady that it was rehabilitation, correct? 8 A. That's correct. 9 Q. And that part of that rehabilitation was a work therapy piece? 10 A. No. 11 Q. You never -- 12 A. I never heard of work therapy. 13 Q. You never heard of work therapy? 14 A. No. 15 Q. Did you understand that part of 16 what you were going to be doing was getting 17 engaged in work when you signed up? 18 A. No. 19 Q. You didn't know that you were 20 going to do internal stuff and there was a requirement that you were going to help out and</p>
<p style="text-align: right;">Page 138</p> <p>1 was withheld? 2 A. Yes. 3 Q. Where did that money go to? 4 A. To The Lovelady Center. 5 Q. To pay for what? 6 A. My rent and my fees. 7 Q. Other than that, was there any 8 money withheld from you that you are aware of? 9 A. Not that I am aware of. 10 Q. What evidence do you have that 11 your client rep could fire you from your job at 12 Blackwell's? 13 A. I was told that if I didn't adhere 14 to the rules and guidelines -- 15 Q. If you didn't adhere to Lovelady's 16 rules and guidelines, Lovelady could take you 17 out of that part of the program, correct? 18 A. Yes. 19 Q. And you couldn't go and do outside 20 work, correct? 21 A. No. 22 Q. Isn't that correct? 23 A. That's correct.</p>	<p style="text-align: right;">Page 140</p> <p>1 do security or wash dishes or child care? 2 A. Not at that time. 3 Q. At what point did you become aware 4 of that? 5 A. During my first thirty days that I 6 was there. 7 Q. How did you think you were going 8 to pay for Lovelady services if you weren't 9 doing some type of work? 10 A. I knew that I was going to 11 eventually have to get a job to work to be able 12 to pay my fees. 13 Q. And you could go and apply outside 14 and work at McDonalds or wherever you wanted to 15 once you got into Phase II or III, right? 16 A. Yes. I just decided to work for 17 The Lovelady Center. 18 Q. You decided to go work at 19 Blackwell's, right? 20 A. Well, I was told that if I didn't 21 apply outside, that I would have work at 22 Blackwell's. 23 Q. You could either go apply</p>

1 somewhere else on your own or they could help
 2 you get on with Blackwell's; is that correct?
 3 A. No.
 4 Q. No?
 5 A. No. I was told.
 6 Q. Told what?
 7 A. To work at Blackwell's.
 8 Q. Didn't you tell me earlier that
 9 you went to somebody and said I want to work at
 10 Blackwell's?
 11 A. Yes, to pay my fees. After my
 12 client rep told me that I could do Blackwell's
 13 or Haymon's Homes, yes, that is when I agreed
 14 to it.
 15 Q. Or you could have gone outside and
 16 done an outside job if you wanted to?
 17 A. Yes.
 18 Q. But you wanted to do Blackwell's?
 19 A. Yes.
 20 Q. That was your choice?
 21 A. I decided, yes.
 22 Q. Is there any evidence that you
 23 have, any documents or stuff people said to you

1 Blackwell's Way, did you put in a written
 2 application for Blackwell's Way's employment?
 3 A. No.
 4 Q. And were you interviewed by
 5 anybody from Blackwell's Way?
 6 A. No.
 7 Q. So you were told by Lovelady
 8 Center to go to Haymon Homes for orientation?
 9 MR. MILLER: Object to the form.
 10 A. That's correct.
 11 Q. (BY MR. CAMP:) I'm sorry. Did
 12 Lovelady Center tell you where to report for
 13 orientation for the work at Blackwell's Way?
 14 MR. MILLER: Object to the form.
 15 A. Yes.
 16 Q. (BY MR. CAMP:) And where did they
 17 tell you to go?
 18 A. To Blackwell's Way.
 19 Q. Where was your orientation, your
 20 training?
 21 MR. MILLER: Object to the form.
 22 A. Oh, my training was at Haymon
 23 Homes.

1 or any information that you have that we
 2 haven't talked about today that you believe
 3 supports your position that you were an
 4 employee of Lovelady?
 5 A. I can't think of any right now.
 6 Q. All right.
 7 MR. MILLER: I think that is all I
 8 have.
 9 MR. CAMP: I have got a few
 10 questions for you, Ms. Bates.

12 EXAMINATION BY MR. CAMP:
 13 Q. When you received your 1099 I
 14 believe you said in 2015, who was that 1099
 15 from?
 16 A. It was from The Lovelady Center.
 17 Q. Did you ever receive a 1099 from
 18 Blackwell's Way?
 19 A. No.
 20 Q. Or from Haymon Homes?
 21 A. No.
 22 Q. When you went to job placement and
 23 said you were interested in working at

1 Q. But you never worked at Haymon
 2 Homes?
 3 A. No.
 4 Q. So you never had any orientation
 5 at Blackwell's Way; is that correct?
 6 MR. MILLER: Object to the form.
 7 A. That's correct.
 8 Q. (BY MR. CAMP:) And when you were
 9 at Haymon Homes, where did you live?
 10 A. In a trailer. There was a trailer
 11 for all of the clients who had to stay there
 12 with a housemother. The trailer --
 13 (Off-the-record discussion.)
 14 A. That was basically it, what I
 15 said.
 16 Q. (BY MR. CAMP:) And the
 17 housemother, who did the housemother work for?
 18 A. For The Lovelady Center.
 19 Q. And what was the housemother's
 20 responsibilities?
 21 A. To oversee all of the clients that
 22 were sent up, to make sure that we reported to
 23 our duties and we did our chores.

1 Q. Now, you had mentioned that if you
 2 wanted to see your kids over a weekend, you
 3 would have to schedule off. If you wanted to
 4 schedule off while you were at Blackwell's Way,
 5 who would you contact?
 6 A. The job placement, the lady in job
 7 placement.
 8 Q. At The Lovelady Center?
 9 A. At The Lovelady Center.
 10 Q. And then Lovelady would decide
 11 whether you could take the time off; is that
 12 correct?
 13 A. That's correct.
 14 MR. MILLER: Object to the form.
 15 MR. CAMP: Did you get that?
 16 THE REPORTER: (Nodding.)
 17 Q. (BY MR. CAMP:) Now, did you ever
 18 work alongside individuals who were graduates
 19 of The Lovelady Center?
 20 A. Yes.
 21 Q. So they were no longer in the
 22 program, correct?
 23 A. That's correct.

1 A. No. It is just an empty lot.
 2 Q. It is just an empty building?
 3 A. Well, empty building, yes.
 4 Q. So you weren't securing Lovelady
 5 Center employees; you were securing property.
 6 Is that correct?
 7 A. That's correct.
 8 MR. MILLER: Object to the form.
 9 Q. (BY MR. CAMP:) Now, while you
 10 were working security, it was your
 11 understanding that you were working off the
 12 fees you had accrued to date; is that correct?
 13 MR. MILLER: Object to the form.
 14 A. That's correct.
 15 MR. MILLER: Have you got my
 16 objection?
 17 THE REPORTER: (Nodding.)
 18 Q. (BY MR. CAMP:) And you said that
 19 you filled out the opportunity credit forms
 20 while you were assigned to that Center; is that
 21 accurate?
 22 A. That's correct.
 23 (Plaintiffs' Exhibit 1 was marked

1 Q. And were they doing any work that
 2 was different than you?
 3 A. No.
 4 MR. MILLER: Object to the form.
 5 A. We were doing the exact same work.
 6 (Off-the-record discussion.)
 7 Q. (BY MR. CAMP:) Just so I am
 8 clear, we talked about the fact that at
 9 Blackwell's Way, you thought that you had had
 10 money improperly withheld by you by Lovelady
 11 Center, correct?
 12 A. Yes.
 13 MR. MILLER: Object to the form.
 14 Q. (BY MR. CAMP:) Did Lovelady
 15 Center pay you overtime while you were assigned
 16 to Blackwell's Way?
 17 A. No.
 18 Q. Now, you talked about working
 19 security at I believe it was Carraway; is that
 20 correct?
 21 A. Yes.
 22 Q. And does Lovelady Center have any
 23 clients at Carraway?

1 for identification.)
 2 (Off-the-record discussion.)
 3 MR. CAMP: I am going to mark this
 4 as Plaintiffs' Exhibit 1.
 5 Q. (BY MR. CAMP:) I am going to show
 6 you some of these opportunity credit sheets.
 7 On these opportunity credit sheets --
 8 MR. MILLER: Before you show them
 9 to her, could I see a copy of them?
 10 MR. CAMP: Yes. Sure. Sorry. I
 11 wasn't anticipating using them with her.
 12 MR. MILLER: Okay.
 13 Q. (BY MR. CAMP:) Take a look at
 14 these sheets.
 15 A. Uh-huh.
 16 Q. The time that you recorded, do
 17 these sheets reflect that you worked security
 18 at Carraway in excess of forty hours in each of
 19 those weeks?
 20 A. Yes.
 21 MR. MILLER: Object to the form.
 22 Q. (BY MR. CAMP:) And we talked
 23 about this minus ten. Do you know what that is

<p>1 for?</p> <p>2 A. No, I don't. That was put on</p> <p>3 there after I signed. When I signed the sheet,</p> <p>4 it said sixty.</p> <p>5 Q. Did you authorize anybody at The</p> <p>6 Lovelady Center to deduct ten hours from your</p> <p>7 sixty hours of reported time?</p> <p>8 MR. MILLER: Object to the form.</p> <p>9 Lacks foundation. Leading question.</p> <p>10 A. No.</p> <p>11 Q. (BY MR. CAMP:) Now, look through</p> <p>12 all of them. All of them have ten hours</p> <p>13 deducted from them in which it puts you under</p> <p>14 forty hours --</p> <p>15 A. Yes.</p> <p>16 Q. -- except for the first one.</p> <p>17 MR. MILLER: Object to the form.</p> <p>18 MR. CAMP: I'm not done with the</p> <p>19 question.</p> <p>20 MR. MILLER: Well, it is so</p> <p>21 leading that I figured I would object.</p> <p>22 Q. (BY MR. CAMP:) Can you tell me if</p> <p>23 on any of those weeks you gave Lovelady Center</p>	<p>1 A. That's correct.</p> <p>2 Q. And while you were at the thrift</p> <p>3 store, did you work along any other employees</p> <p>4 or workers there that were graduates of the</p> <p>5 program?</p> <p>6 A. Yes.</p> <p>7 Q. And did they do any work that was</p> <p>8 different from what you were doing?</p> <p>9 MR. MILLER: Object to the form.</p> <p>10 A. No.</p> <p>11 Q. (BY MR. CAMP:) While you were at</p> <p>12 The Lovelady Center or Blackwell's Way, at any</p> <p>13 point in time did you tell Lovelady to</p> <p>14 designate certain hours that you were working</p> <p>15 as voluntary?</p> <p>16 A. No.</p> <p>17 MR. MILLER: Object to the form.</p> <p>18 Q. (BY MR. CAMP:) Did you ever</p> <p>19 graduate from the program?</p> <p>20 A. No, I did not.</p> <p>21 Q. Why not?</p> <p>22 A. Because I was always working to</p> <p>23 make sure that I made enough money to get my</p>
<p>1 authorization to subtract ten hours?</p> <p>2 A. No.</p> <p>3 MR. MILLER: Now I object.</p> <p>4 Q. (BY MR. CAMP:) Now, if you will</p> <p>5 look up here in the right top hand corner of</p> <p>6 these sheets, they have a number.</p> <p>7 A. Yes.</p> <p>8 Q. Do you know what that number is?</p> <p>9 A. Where they calculated it, the rate</p> <p>10 of pay times the hours that I worked.</p> <p>11 Q. What was your rate of pay while</p> <p>12 you were working security?</p> <p>13 A. Seven dollars and twenty-five</p> <p>14 cents an hour.</p> <p>15 Q. Have you ever worked at the thrift</p> <p>16 store?</p> <p>17 A. Yes.</p> <p>18 Q. Were you paid for the time you</p> <p>19 were employed at the thrift store?</p> <p>20 A. No. It went towards my rent.</p> <p>21 Q. You are saying you got credit for</p> <p>22 those hours towards your rent while you were at</p> <p>23 the thrift store?</p>	<p>1 fees down. And I didn't go to enough of the</p> <p>2 classes so that I could graduate the program</p> <p>3 because I was always working.</p> <p>4 Q. And how long was your program</p> <p>5 supposed to be?</p> <p>6 A. From nine to twelve months.</p> <p>7 Q. And you were actually there a</p> <p>8 little over two years; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know if your client reps</p> <p>11 were graduates of the program?</p> <p>12 A. Yes.</p> <p>13 Q. All of them?</p> <p>14 A. All of my client reps, yes.</p> <p>15 Q. So if you went through the</p> <p>16 program, there was the possibility that you</p> <p>17 could work as a client rep?</p> <p>18 MR. MILLER: Object to the form.</p> <p>19 A. That's correct.</p> <p>20 Q. (BY MR. CAMP:) I wanted to clear</p> <p>21 up one thing. When you were talking about</p> <p>22 sometimes you would babysit a co-client's</p> <p>23 children --</p>

<p style="text-align: center;">Page 153</p> <p>1 A. Uh-huh. 2 Q. -- I think you said when you were 3 asked to do something, you would try to do it; 4 if you couldn't, you didn't. 5 When you were referring to someone 6 asking you to do something, were you talking 7 about a co-client or The Lovelady Center? 8 A. A co-client. 9 Q. Did you have any option not to do 10 what The Lovelady Center told you? 11 MR. MILLER: Object to the form. 12 A. No. 13 MR. CAMP: That is all I have. 14 15 REEXAMINATION BY MR. MILLER: 16 Q. Ms. Bates, your testimony a minute 17 ago about why you left the Center was not true, 18 was it? 19 A. I wasn't asked why I left the 20 Center. 21 MR. CAMP: She was asked why she 22 didn't graduate the program. 23 A. Why I didn't graduate.</p>	<p style="text-align: center;">Page 155</p> <p>1 A. No. 2 Q. That is when you tested positive, 3 was when you went off-site. 4 A. That was one time. 5 Q. When did you work at the thrift 6 store? 7 A. When I first got to the Center. 8 Q. When was that? Do you remember 9 dates? 10 A. Sometime in January or February of 11 2012. 12 Q. Okay. Did you ever ask to be a 13 client rep? 14 A. No. 15 Q. Ever apply for a job? 16 A. Not for client rep. 17 Q. Is that something you aspired to 18 do one day, was to be a client rep? 19 A. Not that I can think of, no. 20 MR. MILLER: That is all I have 21 got. Thank you. 22 A. Okay. 23 MR. CAMP: I have just got one</p>
<p style="text-align: center;">Page 154</p> <p>1 Q. (BY MR. MILLER:) The reason you 2 didn't graduate from the program was because 3 you tested positive for drugs, right? 4 A. Yes. I realize that, yes. 5 Q. I just want to make it clear 6 because you made it sound like a minute ago it 7 was because you didn't get something checked 8 off from a form, but it was because you were 9 doing drugs. 10 A. No. I made it clear that I didn't 11 graduate the program. Because I could have 12 graduated the program and stayed at the Center 13 and -- 14 Q. But you left the program because 15 you tested positive for drugs not once, but 16 twice while you were in there? 17 A. Yes. 18 Q. When they would give you a pass to 19 go out on your own and do something with your 20 family or somebody else is when you did that, 21 that you couldn't handle it and you relapsed -- 22 A. No. 23 Q. -- correct?</p>	<p style="text-align: center;">Page 156</p> <p>1 more follow-up. 2 3 REEXAMINATION BY MR. CAMP: 4 Q. Let's make it clear. You didn't 5 graduate within nine to twelve months of 6 starting your program because you were working 7 all the time. 8 MR. MILLER: Object to the form. 9 A. That's correct. 10 Q. (BY MR. CAMP:) Is that your 11 testimony? 12 A. Yes. 13 Q. You were ultimately dismissed from 14 the program two years after you started it 15 because of a drug violation, correct? 16 A. That's correct. 17 Q. But that was two years after you 18 had started? 19 A. Yes. 20 MR. CAMP: That is all I have. 21 MR. MILLER: Okay. That is all. 22 FURTHER THE DEPONENT SAITH NOT 23 (Deposition concluded at 12:00 p.m.)</p>

1 C E R T I F I C A T E
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4 STATE OF ALABAMA
5 JEFFERSON COUNTY
6

7 I hereby certify that the above
8 and foregoing deposition was taken down by me
9 in stenotypy, and the questions and answers
10 thereto were reduced to typewriting under my
11 supervision, and that the foregoing represents
12 a true and correct transcript of the deposition
13 given by said witness upon said hearing.

14 I further certify that I am
15 neither of counsel nor of kin to the parties to
16 the action, nor am I in anywise interested in
17 the result of said cause.

18
19
20 /s/ LAURA H. NICHOLS
21 Commissioner-Notary Public, State of AL
ACCR License No. 3, Exp. 9/30/2016
22 GA CCR No. 2714, Exp. 4/1/2016
TN LCR No. 679, Exp. 6/30/16
23 Transcript Certified on 10/26/2015